The London Resort Development Consent Order

BC080001

Planning Statement

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Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009
Regulation 5(2)(q)

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Revisions

Revision	Description	Issued by	Date	Approved by
00	Issue for DCO submission	CP/RG	30/12/2020	LRCH/SAV

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Executive Summary

London Resort Company Holdings Limited (LRCH) is seeking to develop and operate a world-class, sustainable, next generation entertainment resort on the banks of the River Thames, known as the London Resort. The London Resort was recognised to be of 'national significance' by the Secretary of State for Communities and Local Government in May 2014 and has been the subject of extensive development, masterplanning and refinement since this time.

The London Resort would deliver a major entertainment attraction to the UK, addressing the absence of any global entertainment resort provision nationally. The London Resort would open its initial phase (known as Gate One) in 2024 and second phase (Gate Two) in 2029 and estimated to reach maturity in 2038. The London Resort would be delivered alongside comprehensive infrastructure provision with improved multi-modal access.

The London Resort will deliver and mobilise substantial direct and indirect regeneration benefits, including the creation of approximately 2,320 Full Time Equivalent (FTE) jobs during construction and 17,310 workers (11,215 FTEs) at maturity in 2038 upskilling the local workforce and adding to the local, regional and national economic, that weigh significantly in its favour. There are expected to be significant direct and indirect benefits attributed to temporary construction employment, operational employment and supply chain. The London Resort will also result in the redevelopment of significant areas of previously developed (brownfield) land (with contamination) and bring forward a key redevelopment site that has been identified within development plan documents for many years.

Whilst potential adverse effects could arise from the London Resort, appropriate mitigation strategies have been identified and will be secured through appropriate mechanisms, such as requirements to the Development Consent Order (DCO) and/or planning obligations. This mitigation would ensure these effects on the local, regional, or national context are minimised and indicate an overall presumption in favour of granting the DCO, as identified within the accompanying Environmental Statement.

While there are no National Policy Statements (NPS) directly prepared for nationally significant infrastructure projects centred on business or commercial developments, the underlying planning policy context at a national, regional and local level identify a policy presumption in favour of granting consent, demonstrating a clear and compelling case in favour of the DCO being made.

Section 105 of the Planning Act 2008 sets out what the Secretary of State must have regard to in making his or her decision where a relevant NPS is not designated, as is the case here. This includes any matter that *'the Secretary of State thinks is important and relevant to the Secretary of State's decision.'* There are considered to be clear and compelling reasons why the Secretary of State can conclude the London Resort will generate significant benefits of national significance, and thus make the DCO.

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Glossary

1987 Order	Town and Country Planning (Use Classes) Order 1987
1990 Act	Town and Country Planning Act 1990
2004 Act	Planning and Compulsory Purchase Act 2004
2008 Act	Planning Act 2008
2009 Regulations	Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009
2010 Regulations	Community Infrastructure Levy Regulations 2010
2013 Act	Growth and Infrastructure Act 2013
2013 Regulations	The Infrastructure Planning (Business or Commercial Projects) Regulations 2013
2016 Act	Housing and Planning Act 2016
2017 Regulations	Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
2020 Regulations	Infrastructure Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020
AIA	Arboricultural Impact Assessment
Applicant	London Resort Company Holdings Limited
CSA	Core Study Area
DBC	Dartford Borough Council
DCO	Development Consent Order
ECC	Essex County Council
EDC	Ebbsfleet Development Corporation
EIA	Environmental Impact Assessment
EIF	Ebbsfleet Garden City Implementation Framework (2017)
EIGP	Ebbsfleet Investment GP Ltd
F&B	Food and beverage
FRA	Flood Risk Assessment
GBC	Gravesham Borough Council
HRA	Habitats Regulation Assessment
HS1	High Speed 1
IMD	Index of Multiple Deprivation
IP	Intellectual Property
KCC	Kent County Council
LPA	Local Planning Authority
LRCH	London Resort Company Holdings Limited
LWS	Local Wildlife Site
NIC	National Infrastructure Commission
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project

PINS	Planning Inspectorate
PRoW	Public Right of Way
Resort	The London Resort
SoS	Secretary of State
SSSI	Site of Special Scientific Interest
TC	Thurrock Council
TPO	Tree Preservation Order
UNESCO	United Nations Educational, Scientific and Cultural Organisation
WTF	Wastewater Treatment Facility
ZoI	Zone of Influence

Chapter One ◆ Introduction

THE LONDON RESORT

1.1 The London Resort will be a world-class, sustainable, next generation entertainment resort on the banks of the River Thames. The London Resort is anticipated to create substantial regeneration benefits, including an investment of over £2bn, the creation of over 17,000 employment opportunities and the redevelopment of significant areas of previously developed (contaminated brownfield) land. The London Resort proposal is recognised to be of 'national significance' and was the first 'business or commercial project' to be designated as a Nationally Significant Infrastructure Project (NSIP) under section 35 of the Planning Act 2008.

1.2 The vision is to create a world-class entertainment resort founded on sustainable and low carbon principles. The London Resort will have a global profile, attracting visitors from all over the world, generating economic benefits for the local area that will reach far into Kent, Thurrock, Essex, London and the UK, supporting job creation and the upskilling the local workforce, tourism and business growth.

1.3 The London Resort will integrate local public rights of way and a green network, with improved access to the River Thames for visitors and local communities, showcasing the natural features by integrating them into the designs. A large proportion of the Swanscombe Peninsula landscape will remain undeveloped or subject to enhancement, providing considerable biodiversity, landscape and access improvements.

THE APPLICANT

1.4 London Resort Company Holdings Limited (LRCH) is the promoter of the London Resort. LRCH is a UK-registered company established specifically to promote the current Project. It is led by a London-based management team with considerable experience of delivering and operating some of the world's largest leisure, sports and entertainment developments, and is supported by international investors. LRCH has entered into licence agreements with UK and international film and television studios and is working closely with these Intellectual Property (IP) to develop high quality and innovative themed attractions in the London Resort.

1.5 LRCH is committed to delivering the London Resort and benefits from a strong leadership team. It has invested heavily in the Project to date, including the acquisition of land, negotiating land deals and option agreements, liaising with IP partners, design and masterplanning tasks and professional fees.

1.6 Renowned international entrepreneur and leisure industry executive PY Gerbeau joined the London Resort as Chief Executive in June 2019. PY Gerbeau has a vast wealth of experience from across the real estate, tourism, retail, sport and entertainment industries,

including roles as Chief Executive Officer of London real estate business X-Leisure Limited, Chief Executive of the group which successfully turned around the fortunes of the Millennium Dome, and Vice President of Operations at Euro Disney (now Disneyland Paris).

THE PROJECT TEAM

1.7 LRCH is supported by an experienced Project team, who are specialists in their disciplines and many which have been involved in the project for a number of years. As a result of the specialisms and longevity of knowledge, the Project team has a detailed understanding and appreciation of the Project Site and its context, having critically explored and developed the proposals over many years leading up to this submission.

1.8 The lead Project team includes:

- Apt – Masterplanning;
- BDB Pitmans – Legal;
- Buro Happold – Utilities and infrastructure;
- Copper – Communications and engagement;
- Environmental Dimension Partnership – Landscape and ecology;
- LRS – Land referencing;
- Savills – Planning, Environmental Impact Assessment co-ordination, land acquisition and Compulsory Acquisition;
- Volterra – Socio-economics and health;
- Wessex Archaeology – Cultural heritage and archaeology; and
- WSP – Transport.

1.9 In addition to the above, the Project team has been supported by further sub-consultants, notably in the preparation of specialist assessments which have informed the Environmental Impact Assessment (EIA) and Habitats Regulation Assessment (HRA). In accordance with the requirements of the necessary regulations, all consultants are considered competent experts in their fields. Further information is included within the respective reports as appropriate.

PURPOSE AND STRUCTURE OF THIS STATEMENT

1.10 This Planning Statement is not required by law to accompany the application. However, in providing the Statement it is hoped it helps summarise the more complex issues addressed within the application.

1.11 The Statement explains and introduces the Project Site and the Proposed Development, including an explanation of the principles behind it. It introduces the legislative framework against which decisions should be taken as well as identifying the key national, regional and local planning policy context. The document provides justification for the Proposed Development, weighing the impacts and benefits of the Proposed Development before undertaking an assessment of planning balance, demonstrating and concluding an overwhelming case in favour of the Proposed Development and the making of the DCO.

RELATIONSHIP TO OTHER APPLICATION DOCUMENTS

1.12 The Planning Statement draws upon the assessments and conclusions contained within the suite of application submission documents and as such this Statement should be read alongside, and in addition to, the numerous other technical and non-technical application documents. In many instances the Planning Statement summarises or paraphrases the contents or conclusions of other technical documents and therefore these other documents should be read in full to gain an understanding of the topics and context in which the extracts are derived.

THE DEVELOPMENT CONSENT ORDER APPLICATION

1.13 LRCH is applying to the Secretary of State (SoS) for Housing, Communities and Local Government for a Development Consent Order (DCO) under the Planning Act 2008 (the 2008 Act) to construct, operate and maintain an entertainment resort, which is very significantly larger than any existing facility in the UK and on par with leading global resorts.

1.14 An application for a DCO has many differences to the typical town and country planning consenting regime established under the Town and Country Planning Act 1990 (the 1990 Act). The 2008 Act introduced the Nationally Significant Infrastructure Project (NSIP) process as a means to streamline the assessment and decision-making for large and complex schemes, seeking to make it fairer and faster for communities and applicants alike and with decisions being taken by the relevant SoS. A DCO is a legal instrument and must follow statutory drafting conventions (a *draft DCO* (document reference 3.1) forms part of the application documents). For these reasons, and more, DCOs differ substantially from planning permission granted under the Town and Country Planning Act 1990 typically administered by Local Planning Authorities (LPAs).

THE APPLICATION DOCUMENTS

1.15 The DCO application is supported by a large number of documents. Some of the application documents are required under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 2009 Regulations) while others are not mandatory but are provided because they support the application by explaining the Proposed Development further. In accordance with Planning Inspectorate (PINS) Advice Note 6: Preparation and submission of application documents (version 9, December 2020), the documents can be broadly categorised under the following headings:

- Part 1 – Application information;
- Part 2 – Plans/Drawings/Sections;
- Part 3 – Draft Development Consent Order and related documents;
- Part 4 – Compulsory Acquisition information;
- Part 5 – Reports/Statements;
- Part 6 – Environmental impact assessment and habitat regulations information; and
- Part 7 – Other documents.

1.16 A large number of technical and supporting reports are provided as appendices to the accompanying Environmental Statement.

1.17 The application is accompanied by a *Guide to the Application* (document reference 1.4) which provides an overview of the documents submitted in support of this application, providing a brief summary of each of the documents. An appendix to that document identifies a full list of all documents that make up the DCO application which will be a 'live' document that is updated to reflect revisions to documents during the course of the examination by the Examining Authority.

REQUIREMENTS

1.18 The *draft DCO* (document reference 3.1) sets out the powers that LRCH is seeking for its delivery and operation of the London Resort. It sets out the parameters for what development would be permitted and is accompanied by a number of Schedules. Also included within the *draft DCO* is a list of 'requirements' to which it is proposed the DCO will be granted. Requirements act in a similar manner to conditions attached to the grant of planning permission under the 1990 Act, in that they require further information or details to be submitted for approval at certain stages of development. Requirements are discussed further in chapter nine of this Statement.

OTHER CONSENTS AND APPROVALS REQUIRED FOR THE PROJECT

1.19 One notable benefit of the 2008 Act is that it allows for a single consenting regime, whereby a number of other consents and approvals required to deliver the project can be included within the DCO. Therefore, included within the *draft DCO* are provisions for a number of other consents and approvals required, including compulsory acquisition powers and environmental consents. Further details are provided within the *Details of other Consents and Licences* (document reference 5.3).

STATEMENT STRUCTURE

1.20 The remaining chapters of this Statement are structured as follows:

- **Chapter 2** describes the background as to policy relating to the Proposed Development;
- **Chapter 3** provides an overview of the site selection process that led to the selection of the Project Site;
- **Chapter 4** provides a high level site description;
- **Chapter 5** sets out the project description, including a breakdown of the Principal Development, Associated Development, and an explanation of the inclusion of Related Housing;
- **Chapter 6** provides an overview of the legislative, planning policy and guidance background to the application;
- **Chapter 7** provides an outline of consultation and engagement undertaken in respect of the London Resort;
- **Chapter 8** undertakes a planning assessment against the key themes and issues associated with the Proposed Development;
- **Chapter 9** provides an overview of proposed requirements and planning obligations;
- **Chapter 10** outlines matters in respect of land acquisition; and
- **Chapter 11** provides a conclusion to the Planning Statement, including matters relating to planning balance.

Chapter Two ◆ Background

OVERVIEW

2.1 This chapter of the statement looks to provide a background to the NSIP process, the designation of the London Resort as being of national significance and identify key national and regional tourism context in which the London Resort is being proposed.

NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS

2.2 The Planning Act 2008 (the 2008 Act) introduced the NSIP process as a means to streamline the assessment and decision-making process for major infrastructure projects.

2.3 Section 26 of the Growth and Infrastructure Act 2013 (the 2013 Act) amended Part 5 of the 2008 Act to enable certain types of 'business or commercial projects' falling within a prescribed description to be authorised under the planning regime that applies to NSIPs. Government introduced these provisions primarily due to concerns over the speed with which these applications were being handled by LPAs. It also responded to Government recognition that the most significant business and commercial schemes can raise complex and controversial issues and may require a number of different associated consents.

2.4 The Infrastructure Planning (Business or Commercial Projects) Regulations 2013 (the 2013 Regulations) subsequently widened the range of projects that can be consented under the 2008 Act to include a specified list of business or commercial developments, including major leisure projects that meet specified criteria. At its schedule, the 2013 Regulations prescribed projects include conferences, exhibitions, sport, leisure and tourism. The accompanying Explanatory Memorandum to the 2013 Regulations (see Appendix 1.0) provided some broad descriptions of development that should be able to use the NSIP regime, and included 'Leisure, tourism and sports and recreation'.

2.5 By introducing the 2013 Regulations, Government enabled business or commercial projects meeting these prescribed criteria to 'opt in' (via a Direction) and progress through the NSIP route.

LONDON RESORT NSIP DIRECTION

Application to Secretary of State

2.6 As a result of the amendments described above to the range of projects capable of being considered under the 2008 Act, LRCH decided the NSIP route was appropriate for the nature, scale and complexity of its Proposed Development. On behalf of LRCH, Savills wrote to the Secretary of State for Communities and Local Government (as it then was) on 25 March 2014 setting out information on the London Resort to allow confirmation

that the scheme can be progressed as an NSIP, meeting the criteria identified under the 2013 Regulations.

2.7 The SoS wrote to Savills on 11 April 2014 requesting additional information and points of clarification. Savills responded the same day on the matters of clarification indicating the London Resort scheme is a commercial use focused primarily on tourism and leisure, thus meeting the conditions set out in section 35(2)(a), (b) and (c) of the 2008 Act.

2.8 The SoS agreed and a formal Direction was subsequently issued by the SoS on 9 May 2014 under section 35(1) of the 2008 Act and the 2013 Regulations relating to world class resort and leisure entertainment district known as the 'London Paramount Entertainment Resort' (as it then was titled), Swanscombe Peninsula and land to the south towards Ebbsfleet Station, Kent. A copy of the Direction is provided at Appendix 2.0.

2.9 The SoS notes in the Direction that the proposal is mainly for the construction of buildings and facilities for tourism and leisure uses that it does not include the construction of any dwellings nor does it include the winning or working of peat, coal, oil or gas. The SoS was therefore satisfied that the proposal falls within a business or commercial project of a prescribed description for the purposes of section 35(2)(a)(ii) of the 2008 Act and Regulation 2 of the 2013 Regulations.

2.10 The SoS considered that the proposal would be likely to have significant economic impact, be important in driving growth in the economy, and that it would have an impact on an area wider than a single local authority. The SoS also identified that the substantial physical size of the proposal was relevant to the decision that the project is on national significance. The SoS indicated the project would benefit from the 'single authorisation' process offered by the NSIP regime.

2.11 Since the Direction, the 2008 Act was amended by section 160 of the Housing and Planning Act 2016 (the 2016 Act) to allow for the inclusion of 'related housing development' within the NSIP process where there is a functional need or it is in geographical proximity to the project. Until this amendment, the SoS could not grant approval for housing as part of an application for a NSIP, submitted under the 2008 Act. The 2016 Act therefore changed the approval system to allow developers to include an element of housing as part of their application for consent for an infrastructure project deemed of national significance. The housing must be on the same site, next to, or close to the relevant infrastructure development, or otherwise associated with it. Guidance published in March 2017 sets a maximum limit of 500 dwellings[1].

2.12 LRCH's detailed review of its Business Plan during 2019 established that the inclusion of 500 dwellings would provide a significant benefit, providing a functional need by delivering high quality accommodation for staff directly employed in the management and operation of the London Resort while being in geographical proximity, within the same contiguous Order Limits. Legal advice and subsequent discussions with the Planning Inspectorate (PINS) has confirmed the acceptability of introducing 500 dwellings to the

[1] Planning Act 2008: Guidance on Nationally Significant Infrastructure Projects and Housing (DCLG, March 2017)

Proposed Development as associated development after the SoS decision to award the project NSIP status in 2014.

NATIONAL ECONOMIC POLICY AND CONTEXT

Overview

2.13 In the Direction, the SoS noted the significant economic impact expected to arise from the London Resort and its likely importance in driving growth in the economy, with an impact greater than the immediate local authority area. In this context, it is helpful to understand the national economic policy and context in which the Proposed Development sits, including the impacts of the COVID-19 pandemic.

Budget 2020 (March 2020)

2.14 The 'Budget 2020: Delivering on Our Promises to the British People' was delivered on 11 March 2020 by the Chancellor of the Exchequer and saw record levels of financial investment totalling some £928 billion for infrastructure, roads, rail, telecoms, energy and housing. The Budget 2020 was a significant announcement in light of the COVID-19 pandemic.

2.15 The key headlines of the budget in respect of infrastructure and development included:

- Infrastructure – £640 billion of gross capital investment for roads, railways, communications, schools, hospitals and power networks up to 2025;
- Roads – £27 billion on 4,000 miles of upgraded roads and 100 junction improvements; and
- Telecoms – £5 billion investment in rural fast broadband and delivering 4G coverage to 95% of the country.

2.16 In delivering the Budget 2020, the Chancellor's speech included several references to the importance of investing and delivering in national infrastructure and growth, including:

'We are investing in world class infrastructure, and to lead the world in the industries and technologies of the future.'

and

'We need to build the infrastructure that will lay the foundations for a new century of prosperity. We need to grab the opportunity to upgrade, to improve, to enhance, to level up. That starts today with the next part of our plan – as we get Britain building.'

2.17 At a high level, the Budget 2020 therefore supports significant investment in national infrastructure and world-class industries as an economic stimulus.

The Ten Point Plan for a Green Industrial Revolution (November 2020)

2.18 As part of the UK Government's 'Building back better, supporting green jobs, and accelerating our path to net zero' campaign, The Ten Point Plan for a Green Industrial Revolution (November 2020) sets out the foundations in the form of 10 key action areas to deliver the Green Industrial Revolution. The Plan seeks to mobilise £12bn to deliver thousands of green jobs and reduce carbon emissions by 180 million tonnes between 2023 and 2032 – with an overarching ambition of reaching the UK's carbon emissions target of net zero by 2050.

2.19 Of greatest relevance to the London Resort are Points 4, 5, 6, 7 and 9, which are discussed in turn in the following paragraphs.

- Point 4 (Accelerating the Shift to Zero Emission Vehicles) – seeks to capitalise on the UK being a leading manufacturer of Electric Vehicles and proposes to cut emissions, create jobs and strengthen industry through ending the sale of new petrol and diesel cars and vans 10 years earlier than originally planned, now 2030. The policy implications include realising carbon savings, thousands more ultra-low and zero-emission cars and vans on UK roads, supported by additional funding for plug in vehicle grants, and thousands more charge points in homes, places of work, residential streets and highways networks.

- Point 5 (Green Public Transport, Cycling and Walking) – seeks to increase the journey share taken by public transport, cycling and walking through investments in rail and bus services and measures to help pedestrians and cyclists.

- Point 6 (Jet Zero and Green Ships) – seeks to build on UK strengths in aviation and maritime technology by increasing the uptake in sustainable aviation fuels, investments in R&D to develop zero-emission aircraft and developing infrastructure at airports and seaports.

- Point 7 (Greener Buildings) – focuses on making buildings more energy efficient to include homes, workplaces, schools, and hospitals which will support 50,000 jobs to build new supply chains and factories. The plan seeks to incentivise the move from fossil fuel use over the next fifteen years.

- Point 9 (Protecting our Natural Environment) – seeks to safeguard landscapes, restore habitats for wildlife to combat biodiversity loss and adapt to climate change whilst creating green jobs. Policy implications include new National Parks, AONB designations and Landscape Recovery projects and investment in flood defences in England.

National Infrastructure Strategy (November 2020)

2.20 Published on 25 November 2020, the National Infrastructure Strategy (November 2020) sets out the UK Government's plans to transform its approach to infrastructure policy and delivery, in response to the work done by the National Infrastructure Commission (NIC) in

assessing the infrastructure needs of the country, namely the National Infrastructure Assessment undertaken by the NIC and published in July 2018. The strategy was due to be published alongside the Budget in March 2020 however it was delayed to allow the Chancellor, who had just taken post, time to reflect on the strategy.

2.21 The focus of the Strategy is to address the short- and long-term challenges that face the UK's infrastructure. The Strategy sets out the Governments four-point vision which includes:

- a united UK with thriving communities, cities, regions and nations;
- greener and more beautiful places;
- the UK to be a world leader in new technologies; and
- a stable and robust regulatory and delivery system.

2.22 In addressing the long-standing infrastructure challenges the Strategy is split into five chapters which seeks to define the areas of the Strategy's focus.

- Chapter 1 focuses on how infrastructure can boost short term economic growth and drive the recovery from the COVID-19 pandemic;
- Chapter 2 focuses on levelling up the economy with specific plans to level up the nations, regions, cities and towns of the UK to strengthen the Union;
- With reference to the Government's Ten Point Plan for a Green Industrial Revolution, Chapter 3 sets out the Government's plan to decarbonise power, heat, heavy industry and transport networks;
- Recognising investment uncertainty in the private sector, Chapter 4 relates to private investment of infrastructure which includes establishing a new UK infrastructure bank to harness private capital investment; and
- The final chapter, Chapter 5, seeks to address the timescales to delivering infrastructure by setting out steps the Government intends to take to accelerate and improve infrastructure delivery. This is intended to be achieved through the Project Speed taskforce and makes reference to speeding up the planning system.

2.23 With specific consideration to the implications of the Strategy on the London Resort, Chapter 2 sets out key transport investments being made by the Government in England. In the London & South East region, this will include investing in the Lower Thames Crossing and financing the completion of Crossrail. Chapter 4 focuses on supporting private investment – in particular the actions Government is taking which includes co-investing alongside the private sector in infrastructure projects and producing an overarching policy paper on economic regulation in 2021. The Strategy recognises the vital role the private sector plays in achieving the UK's infrastructure ambitions. The Strategy concludes by

identifying key areas of infrastructure policy to be published over the next 12 months which collectively aim to strengthen and transform the UK's infrastructure networks.

National Infrastructure Assessment (July 2018)

2.24 As noted above, the National Infrastructure Commission (NIC) undertook an assessment on the state of infrastructure within the UK. This document, the first National Infrastructure Assessment, sets out a long-term vision for high quality, good value, and sustainable economic infrastructure for the UK. The National Infrastructure Assessment looks at the UK's future economic infrastructure needs up to 2050 and makes key recommendations for how to deliver new transport, low carbon energy and digital networks, how to recycle more and waste less, and how future infrastructure should be paid for.

National Infrastructure Delivery Plan 2016-2021 (March 2016)

2.25 This document recognises that infrastructure is integral to the economy and signifies that the Government is determined to deliver better infrastructure in the UK to grow the economy and improve opportunities.

2.26 The National Infrastructure Delivery Plan brings together the Government's plans for economic infrastructure over the next 5 years with those to support delivery of housing and social infrastructure, updating and replacing the previous National Infrastructure Plan. The document does not specifically identify infrastructure to support leisure resort developments, however there are considered to be important overlaps through topics relevant to the London Resort such as road, rail, energy, digital communications, flood defence, water and waste and regional infrastructure.

Planning for the future – White Paper (August 2020)

2.27 In August 2020, the Secretary of State launched a consultation on the 'Planning for the Future White Paper', which aims to reform the planning system to streamline the planning process and accelerate delivery of new homes. The consultation closed in October 2020.

2.28 There have been a series of reforms to the planning system announced in recent months as part of the Government's drive to 'Build Build Build.' The potential effects of the White Paper are far reaching, however, the most pertinent aspects in respect of the London Resort are identified in the following paragraphs.

Three Pillars

2.29 Setting out three pillars for the future of planning, the White Paper seeks to review how development is planned, bring a new focus to design and sustainability and reform how infrastructure associated with development is delivered. It proposes long-term structural changes to the planning system rather than more immediate amendments to existing processes.

Zonal

2.30 The White Paper indicates a move towards a zonal system with areas of England allocated as either Growth Areas, Renewal Areas or Protected Areas. Local Plans will be digitised, with increased emphasis on map-based planning to make development plans more accessible and reduce their length. The nature and process of public engagement will radically change, with increased emphasis on digitalisation of plans and method of engagement with increased interaction during plan-making.

2.31 The existing Local Plan system already allocates (or 'zones') land for different types of development and in that regard the zoning system is not a substantial departure from the existing system. Equally, plan policies typically promote good design and sustainable place-making, which will continue to be key themes going forward. What is more significant is that once zoned it is assumed that the land designated has 'permission in principle' – a zoned system with no further controls. A fundamental change to the existing system will take significant time and effort to become embedded by everyone involved, utilising a range of skill sets, and while a transitional period is indicated, it is not clear how long this would remain in place. Past experience suggests that change on this scale has a potential downside risk of causing delay in the delivery of new plans and in timely decision-making. The ability of local authorities to adopt new technology for consultation and plan production needs further understanding to ensure this is adequately resourced.

Planning obligations

2.32 The White Paper proposes reform of planning contributions, including the abolition of the Community Infrastructure Levy (CIL) and Section 106 Agreements, intended to accelerate the delivery of development whilst continuing to provide affordable housing, although footnote 18 suggests they may be retained in some form. A new Infrastructure Levy is proposed to capture the land value uplift created by a planning approval and use this to enhance infrastructure delivery.

2.33 The principle behind CIL was that it would reduce the complexity of the Section 106 process. Negotiating and agreeing Section 106 Agreements, particularly on larger sites, remains a complex and challenging process post resolution and is a major cause of delay. However, it does create a direct link between new development and the measures necessary to mitigate the effects of new proposals.

REGIONAL AND LOCAL ECONOMIC POLICY AND CONTEXT

Overview

2.34 Regional economic context is set by a number of economic partnerships, including the South East Local Enterprise Partnership (SELEP), Kent and Medway Economic Partnership (KMEP), the Thames Gateway Kent Partnership (TGKP) and most recently the Thames Estuary Growth Board. This section seeks to explore key policy and research themes emerging in this regard.

South East Local Enterprise Partnership Strategic Economic Plan (March 2014)

2.35 The South East Local Enterprise Partnership (SELEP) covers the counties of East Sussex, Essex, Kent, Medway, Southend and Thurrock. Published in March 2014, this document represents the SELEP's first Strategic Economic Plan.

2.36 The Strategic Economic Plan notes that the SELEP will utilise its scale to maximise private, public and community investment to build upon plans developed with local business experience and market knowledge across functional economic areas to deliver and target growth. The document notes that, by 2021, there is an aim to create 200,000 private sector jobs and significantly enhance skills and training.

2.37 It made the case for a Local Growth Fund investment from Government of £1.2 billion – £200m a year – from 2015 to 2021, matched by private and public funds, to be invested in a programme of activities across East Sussex, Essex, Kent, Medway, Southend and Thurrock to transform business growth and infrastructure.

2.38 Specific recognition to the London Resort is provided on page 50, where it recognises the benefits of unlocking the employment potential of the world class leisure resort. The document encourages Ebbsfleet Garden City and investment in infrastructure.

Unlocking the Potential: Going for Growth - Kent and Medway's Growth Plan: Opportunities, challenges and solutions (2013)

2.39 This document, prepared by Kent and Medway Economic Partnership, sets out the opportunities, challenges and solutions to meet a series of objectives. The objectives include:

- Objective 2: Create sustainable private sector employment with the creation of an additional 40,000 jobs;
- Objective 3: Increasing economic value through levels of productivity and innovation, leading to an additional 7,500 knowledge economy jobs

2.40 Swanscombe Peninsula is identified as an opportunity area within the Thames Gateway. On page 15 the document provides specific reference to the London Resort, noting:

'Swanscombe Peninsula – up to 27,000 jobs at a proposed international leisure park on a formerly contaminated brownfield site.'

2.41 The document identifies a commitment to continued investment in Visit Kent to promote the county, ensuring a consistent, quality brand. The document notes, at page 39, that a solution is supporting business growth by offering

'sector-specific support to tourism and hospitality businesses, including financial support, with the aim of supporting micro enterprises and raising product quality'.

Kent and Medway Growth and Infrastructure Framework: 2018 Update (2018)

2.42 Prepared by KCC, this document follows on from the original Kent and Medway Growth and Infrastructure Framework (September 2015). The 2018 update recognises the link between infrastructure and growth. The Growth and Infrastructure Framework provides a strategic framework across Kent for identifying and prioritising investment across a range of infrastructure, for planned growth up to 2031. The framework identifies itself as fundamental in providing robust evidence to attract investment and engagement, and in supporting the case for public funding bids and packaging projects for major private sector investment.

2.43 The document identifies that for Kent and Medway there will be an additional 170,300 jobs between 2011 and 2031, a 21% growth.

Thames Gateway Kent Partnership: Plan for Growth 2014-2020

2.44 The Growth Plan sets out the ambitions of the Thames Gateway Kent Partnership for sustainable economic growth and prosperity in North Kent.

2.45 The document sets out a series of objectives, including improving the productivity of the North Kent economy (Objective 1), attracting and retaining investment in our priority employment locations (Objective 2), ensuring development achieves the highest possible quality (Objective 5), improving the skills of North Kent's workforce and tackle unemployment (Objective 6) and supporting the creation of at least 58,000 jobs between 2006 and 2026 (Objective 7).

2.46 The document identifies the London Resort in the foreword and throughout, signalling the great opportunity it represents. Specifically, regarding the London Resort, the document at paragraph 2.8 notes

'The economic benefits would reach far into Kent, London and the wider South East in terms of supply chains, enhancement of the leisure, hospitality and tourism offer and co-location of associated creative and digital industries. The impact on employment, training and career opportunities for North Kent residents would be transformational, and the boost needed to incentivise complementary investment, development and economic growth across Thames Gateway Kent.'

Thames Estuary Growth Board: Action Plan 2020

2.47 The Green Blue Thames Estuary Growth Board Action Plan 2020 sets out the Thames Estuary Growth Board's plans for the initial two-year period from 2020 and looks ahead over the next decade. The London Resort was featured in the launch event in July 2020. The Action Plan seeks to maximise the benefits, potential and opportunities of the River Thames, and the land, communities, places and businesses that are bound to it by backing key infrastructure projects including the Lower Thames Crossing, improving connectivity to Ebbsfleet, the protection and improved usage of the river's piers and wharves and strategic road improvements.

2.48 The Action Plan sets out a non-exhaustive list of foundation infrastructure initiatives, people initiatives, and green initiatives that will be supported in a proportionate way by the Board together with actions of the Thames Estuary Envoy and seeks to establish credibility and influence with investors, regional and national Government, public, private and third sector organisations, businesses and the media.

Thurrock Economic Growth Strategy 2016-2021

2.49 The document notes that its overall aim is to provide a basis for securing investment and economic diversification, including the identification of new and exciting opportunities for Thurrock. The document identifies six growth areas, including Tilbury within which the expansion of the Port of Tilbury is noted. An emerging strategic theme through the document is to develop a skilled workforce with clear career progression routes responding to business needs.

Kent and Medway Economic Renewal and Resilience Plan (August 2020)

2.50 In response to the COVID-19 pandemic, this document provides recognition of a need to work to back jobs and businesses through the crisis and build a more sustainable economy for the long-term. The document looks forward over the next 18 months and seeks to set out a framework for action for the medium term.

Thurrock COVID-19 Outbreak Control Plan (June 2020)

2.51 In response to the COVID-19 pandemic, this document sets out the local strategy to prevent and control COVID-19 in Thurrock going forward as required by the UK Government. The aim of the Plan is to minimise the number of deaths whilst reopening as much of the economy as possible to mitigate public health harms caused by lockdown.

NATIONAL TOURISM POLICY AND CONTEXT

Overview

2.52 There is considerable background policy and context to tourism within the UK. There has also been significant research undertaken in respect of the value of tourism to the UK economy. The paragraphs below seek to identify and summarise some of the most pertinent context to the Project Site but does not attempt to be exhaustive.

Industrial Strategy: Tourism Sector Deal (June 2019)

2.53 This document sets out how the Government and industry will work in partnership to boost productivity, develop the skills of the UK workforce and support destinations to enhance their visitor offer.

2.54 The document seeks to deliver on increased visitor numbers, productivity and develop an understanding, and respond to, 'visitors of the future.' The document highlights the importance of infrastructure to support the tourism sector, ranging from transport and

accommodation. It notes the industry will create an extra 130,000 bedrooms across the UK by 2025 - a significant increase of 21% in accommodation stock.

2.55 The document notes that the industry will continue to invest in tourism attractions and innovative products, to remain a global leader in the experiences the UK offers visitors, aiming to be the most accessible destination in Europe.

Tourism: jobs and growth – The economic contribution of the tourism economy in the UK (Deloitte, November 2013)

2.56 Deloitte, together with Oxford Economics, were commissioned by VisitBritain to update the findings of a study on the economic contribution of tourism in the UK. The updated report seeks to quantify the economic contribution of tourism in terms of direct and indirect impacts from various sectors. The report looks at the current economic contribution and future outlook and challenges for the tourism economy. While the report is now some years old, the findings remain of relevance to the London Resort, particularly in terms of key trends over the next decade and longer-term opportunities.

2.57 Of particular relevance are the key drivers which are:

- Bilateral exchange rates;
- Consumer spending;
- Overall macroeconomic performance;
- Investment; and
- Destination attractiveness.

2.58 Demand from international visitors is expected to grow particularly strongly, while domestic tourism will also see an increase. The report notes that owing to a lower growth in outbound travel this is likely to have implications for the UK through increases in 'staycations'. Key trends over the next decade include:

- Digital world – The tourism economy must invest in technology. Opportunities from emerging markets in the longer term; and
- Trip costs – Depreciation of the Pound makes the UK more attractive to international visitors, however the UK continues to be seen as a relatively expensive destination.

A Strategic Framework for Tourism 2010-2020 (Revised edition 2011)

2.59 This strategic framework was launched in 2010 and revised in 2011 following the publication of the 2010 Deloitte report 'Tourism: jobs and growth – The Economic Contribution of the Visitor Economy: UK and the Nations' (see above). The framework identifies the focus for work and timescales for its completion covering the period up to 2020.

2.60 The framework introduces four interdependent key objectives designed to address the opportunities and challenges facing the visitor economy in England. These include:

- Objective 1 – To increase England's share of global visitor markets;
- Objective 2 – To offer visitors compelling destinations of distinction;
- Objective 3 – To champion a successful, thriving tourism industry; and
- Objective 4 – To facilitate greater engagement between the visitor and the experience.

2.61 Visit Kent expects that meeting the above objectives will help achieve an annual growth target of 5% for tourism. The framework concludes that growth in the visitor economy is dependent on a coordinated and sustainable approach by the tourism industry working with sectors responsible for infrastructure development which significant development proposals, such as the London Resort, will ensure is achieved.

Government Tourism Policy (Department for Culture, Media and Sport, March 2011)

2.62 Following a speech made by the then Prime Minister David Cameron in August 2010 which was entirely devoted to tourism because 'the industry is an often overlooked giant within the UK economy', this new Tourism Policy was issued which provides helpful context to the London Resort.

Why Tourism Matters

2.63 Tourism is one of six biggest industries and the UK's third largest export earner accounting for almost £90bn annual direct spend. It equally creates employment for all parts of the UK and is also a cost-effective way to regenerate run-down communities.

Delivery Change: Stronger, More Focused Tourism Bodies

2.64 The tourism industry relies heavily on public funds for marketing activity and through new independent tourism bodies and the elimination of structural problems, will enable the industry to take responsibility for its own future, the structure and funding of which is set out through a new system.

Raising Industry Standards – Harnessing Consumer Power

2.65 In an effort to increase competition and raise productivity faster and efficiently, the policy seeks to strengthen the voice and power of consumers through a series of measures to enable better-informed choices with clear and accurate information.

Driving Productivity Gains: Making the Industry More Competitive

2.66 Seeking to drive up productivity to ensure the UK remains competitive and attractive as a destination for both international and domestic travellers, the Government seeks to: improve skills in the sector; increase resilience particularly in bad weather; improving the planning process which recognises the difficulty in obtaining planning permission and

correlation with economic performance and makes business investments harder; and improve regulation.

A Better Way to Travel: Improving Our Transport Infrastructure

2.67 Recognising areas where infrastructure is causing concern, the Government seeks to improve the visa process; cut port transit times with a particular focus on airports; reduce queue times at passport control; and prioritise improvements and repairs to road and rail networks through available evidence relating to tourist use of the rail network.

Delivering a Golden Legacy: A growth strategy for inbound tourism to Britain from 2012 to 2020 (Visit Britain) (April 2013)

2.68 Published in April 2013 by the then Secretary of State for Culture, Media and Sport, this report sets out how the Government seeks to ensure opportunities arising from the added profile of successfully hosting the Olympic and Paralympic Games in 2012 are capitalised upon. The document recognises that the tourism industry can deliver the economic legacy of the 2012 Games by creating jobs at all skills levels and deliver much needed economic growth.

2.69 The strategy has four key elements:

- 1. Improve Britain's image;
- 2. Increase distribution through the travel trade in key markets;
- 3. Improve the produce where necessary; and
- 4. Make it easier to visit Britain by improving visas and aviation capacity.

Tourism Action Plan (August 2016)

2.70 In August 2016 the Government published its Tourism Action Plan. The action plan has five main themes:

- Tourism landscape;
- Jobs and skills;
- Transport;
- Common-sense regulations; and
- A GREAT welcome.

2.71 Published in the aftermath of the UK referendum on leaving the European Union, the Tourism Action Plan includes a series of new initiatives and measures to help Britain compete with other international tourism destinations, welcoming more overseas visitors and encouraging British residents to holiday at home.

2.72 The specific aims of the strategy are to:

- Build awareness of Britain's attractiveness as a tourism destination among those who have not yet visited Britain;
- Encourage prior visitors to return; and
- Provide a series of opportunities and incentives, working in partnership with the private sector, to visit Britain now.

Tourism Action Plan – Tourism Plan - One Year On (October 2017)

2.73 In October 2017, the Government published the Tourism Action Plan – One Year On. This sets out progress that had been made in the preceding twelve months and areas where the Government will seek to deliver further change for the rest of the plan period.

Visit Britain / Visit England – Our Five Year Strategy 2020-2025

2.74 Tourism in Britain is worth £127 billion, contributing 9% GDP and accounting for 10% of all jobs. Until the COVID-19 pandemic, spending by overseas visitors was predicted to reach a record £26.6 billion in 2020 with overseas visits growing to 39.7 million, the highest ever. The national tourist agency's new five-year strategy sets an ambitious growth target for Britain - to attract 49 million visits by 2025, spending £35 billion.

2.75 To this end the strategy has five main objectives, described as follows:

- Focusing on the most valuable visitors to Britain and those with the highest propensity to travel, we will grow the value of both leisure and business tourism to Britain through our new market strategies and support venues and industry to win international business events. We will also encourage more people to holiday at home through our domestic marketing activity;
- Driving the dispersal of tourism value across Britain, we will develop products to appeal to our best prospect visitors, working with destinations across England, Scotland and Wales on our global marketing campaigns. Building on our commercial activity, our partnerships will be integrated further and deepened to leverage even greater reach, innovation and value;
- We will support productivity optimisation, through the development of product that extends the season and length of stay for both international and domestic visitors, as well as through the distribution of that product through platforms such as Tourism Exchange Great Britain;
- In line with our statutory role as advisor to Government and industry, we will continue to be the expert body on growing tourism, trusted to provide unique insights and guidance so that the economic importance of tourism is understood by politicians, Government departments and the media; and

- The three-year £40m Discover England Fund helped stimulate new product development in England, but there is still a wealth of opportunities for growth in England's regions. We will deliver a clear strategy for England, continue to be a 'voice for England' and work with industry to support productivity, grow value and reach new markets and segments.

2.76 By providing a visitor attraction of international status, open throughout the year, in an area that is not currently a premier tourism and leisure destination, the London Resort would make a very significant contribution to the attainment of Visit Britain / Visit England's objectives, along with those of Visit Kent. In the absence of an NPS for tourism and leisure, the Five Year Strategy represents an important expression of national need against which the London Resort can be assessed.

Five Point Plan (July 2015)

2.77 Recognising that tourism-related industries support almost 1 in 10 jobs in the UK, in 2015 the Government published their five-point plan in an effort to encourage more visitors to boost the economy across the entire country. Each point is summarised as follows:

1. Tourism Landscape – Seek to improve effective coordination of tourism through enhancing collaboration between tourism bodies and strengthening the digital presence of the UK tourism sector;

2. Skills and jobs – Given the growth of the industry, to attract and retain talent through supporting businesses which are driving the growth, focussing on making support and information accessible, making apprenticeships work better, and attracting the best and brightest to careers in the sector;

3. Common sense regulation – Recognising the dynamic nature of the sector to ensure the regulatory framework remains under review to capture opportunities to protect and grow the tourism sector;

4. Transport – Link the tourism sector with transport through increasing rail, air and road capacity, assist travel outside of London, and help visitors get around other regions of the UK; and

5. A GREAT Welcome – Ensure tourists arriving to the UK receive a warm welcome through improving services standards at the Border and ensure passengers are processed efficiently.

Tourism Landscape (May 2016)

2.78 Following the publication of the Five Point Plan for Tourism, this publication issued by the Department for Culture, Media and Sport in May 2016 outlines the support needed to the tourism sector given the time investment required in collaborative endeavours by businesses and sets out changes to strengthen co-ordination across the tourism landscape. The key changes proposed include:

1. Establishment of an Inter-Ministerial Group on Tourism (to co-ordinate and oversee action across Government);

2. Re-vamping the Tourism Industry Council (bringing Government and industry together);

3. Establishment of a new Events Industry Board (to co-ordinate and enhance the UK offer on events and exhibitions with a specific aim of holding more world class events);

4. Changing governance of VisitBritain and VisitEngland (to work collaboratively to enhance tourism growth); and

5. Announcement of a new Discover England fund to incentivise England's c. 206 destination organisations to join up (building world class tourism experiences and products across England).

REGIONAL AND LOCAL TOURISM POLICY AND CONTEXT

Overview

2.79 At a regional and local level there is recognition as to the role leisure and tourism can offer to the economy. The paragraphs below seek to identify and summarise some of the most pertinent context to the Project Site but does not attempt to be exhaustive.

Visit Kent Annual Review 2019

2.80 This document provides an overview of the year, recognising the politically turbulent 2019 and the economic difficulties being faces by the tourism industry in 2020 as a result of the COVID-19 pandemic. The document provides a high-level review of Visit Kent, as the regional tourism body, over the year on matters such as place-making and lobbying; marketing; campaigns; networks and business support.

Economic Impact of Tourism Kent – 2017 Results (Destination Research, November 2018)

2.81 This report commissioned by Visit Kent examines the volume and value of tourism and impact of visitor expenditure on the local economy and was an update on the previous publication in 2015. The headlines for 2017 showed 65 million trips undertaken in the area with a total expenditure of £3.865bn by visitors as a result of tourism. The results also highlighted that 76,852 jobs were supported by the sector. This suggests that between 2015 and 2017, there was a 7.1% increase in trips, a 7.1% increase in value and a 6.9% increase in jobs.

2.82 The value of the visitor economy to Dartford and Gravesham is provided in Table 2-1.

Table 2-1: Value of visitor economy to Dartford and Gravesham (2017)

	Dartford	**Gravesham**
Visitors	10.8m	2m
Value	£548m	£113m
Jobs	9,765	2,567

Source: Economic Impact of Tourism Kent – 2017 Results (Destination Research, November 2018)

2.83 The report is supported by thematic maps showing the economic impact of tourism through distribution of trips, value and employment, revealing the following:

- Volume of trips – The proportion received by Dartford and Gravesham was just 4-5% of the County total being on the lower end of the scale;
- Tourism Value – Dartford is reported as receiving 8-14% of the total County value compared to 3-6% for Gravesham. This is largely attributed to the Bluewater Shopping Centre; and
- Tourism Employment – Dartford has 8-13% of the County total compared to Gravesham with 3-6%. Again, this is attributed to the Bluewater Shopping Centre.

2.84 This report suggests that the provision of an international attraction in the form of the London Resort would significantly improve the proportion of the economic benefit by Dartford, Gravesham and Kent as a whole in terms of the volume of trips, tourism value and employment.

Gravesham Tourism Strategy 2009-2012

2.85 This draft document notes that the Borough attracts only a small percentage (3%) of Kent's visitors, suggesting this may be caused by a relatively small stock of visitor accommodation and no major commercial visitor attractions.

2.86 The document references GBC's Corporate Plan which notes that a developing tourism market can contribute towards securing a sustainable and buoyant economy. Using the London 2012 Olympics as a stimulus, the document seeks to establish clear priorities for action and objectives which, through working in partnership with other agencies, tourism businesses and the voluntary sector, seek to promote additional resources and investment in tourism within Gravesham.

CONCLUSION

2.87 At a national level, the above background has identified a context for the development of additional national infrastructure to support economic growth through an expansion of the tourism sector. The most obvious recognition of this fact is amendments to the 2008 Act which enabled business and commercial projects to progress through the NSIP route,

given their strategic importance to facilitating economic growth. In the context of the London Resort, this has been confirmed by the SoS Direction permitting the London Resort to progress down the NSIP route.

2.88 National tourism objectives seek to improve the visitor experience and offer within the UK, seeking to attract further visitors and encourage them to spend more and stay longer. This relates not only to domestic tourism but also international tourism. The Proposed Development would provide a significant offering to the UK in respect of delivering a world-class entertainment resort that would provide a significant contribution to the leisure economy within the UK in a manner that is wholly consistent with the direction and messaging of the policy objectives and ambitions at a national level.

2.89 At a regional and local level, there is considerable economic support for regeneration within Kent, and specifically the improvement to tourism and leisure. Many of the aforementioned documents specifically reference the London Resort and its importance in delivery aspirations and growth to the economy. There is clear support within the documents to see the delivery of the London Resort as an economic stimulus within the locality.

Chapter Three ◆ Site selection

OVERVIEW

3.1 An effective site selection process is a precondition for a successful project. This chapter sets out an overview of the process by which the Project Site was selected for the development of the London Resort. Detailed assessment is provided and set out within Chapter 4: *Project development and alternatives* of the accompanying Environmental Statement (document reference 6.1.4). This chapter does not therefore seek to repeat the detailed explanation and assessment contained within the ES in full but provide an overview.

CONTEXT FOR THE DEVELOPMENT OF THE SCHEME

3.2 LRCH was formed in May 2011, upon which it began to investigate the economic feasibility of delivering a major world class leisure and visitor attraction within the UK, which it identified as lacking within the UK leisure and tourism industry.

3.3 An early question faced by LRCH was where in the UK an entertainment resort with a truly global profile in the UK should be located. By a large margin, London is the most popular destination for international visitors, suggesting that a location close to the capital was desirable. London offers direct air and rail connections and is located conveniently with respect to international ferry services. Domestically, London is also the hub of the national rail and road networks. No other region of the UK (and few places elsewhere in Europe) offer comparable connectivity or population density. For these reasons it was determined that the London Resort should be located within 100 km of central London.

SITE SELECTION CRITERIA

3.4 With the defined area of search, a list of site selection criteria were identified across planning, environmental, commercial and transport considerations. The criteria identified were:

- Land availability;
- Land use;
- Proximity to and connectivity with central London;
- Transport and accessibility;
- Environmental constraints;

- Planning constraints;
- Regeneration and economic benefit; and
- Micro-climate.

3.5 It was subsequently concluded that the location should offer a climate conducive to the year-round operation of an entertainment resort, having regard to the fact that visitors will be outside at various times during their visits. The micro-climate criterion was subsequently removed at an early stage because, with the options sharing a broadly similar climate, it provided no meaningful basis for differentiation.

SITE OPTIONS

3.6 The initial search for broad locations for the London Resort combined a desktop search, site inspections and contacts with landowners and agents. Options identified through this process are listed below.

1) North Northamptonshire;
2) Marston Vale;
3) Luton and Dunstable;
4) M25 north corridor;
5) M11 corridor;
6) Great Leighs racecourse, Essex;
7) Southend-on-Sea and Canvey Island;
8) Cliffe, north Kent;
9) Swanscombe Peninsula, Kent;
10) Ashford, Kent; and
11) Olympic Park legacy development sites, London.

3.7 The findings of the individual evaluations of these eleven options are summarised in greater detail within appendices to Chapter 4: *Project development and alternatives* of the ES (document reference 6.1.4) but the key findings are presented in Table 3-1 below.

Table 3-1: Summary of the site options evaluation undertaken by LRCH in 2011-12

	Option	Land availability	Land use	Proximity to London	Transport and accessibility	Environmental constraints	Planning constraints	Regeneration and economic benefit		Overall assessment
1.	North Northamptonshire									
2.	Marston Vale									
3.	Luton / Dunstable									
4.	M25 north corridor									
5.	M11 corridor									
6.	Great Leighs racecourse									
7.	Southend / Canvey Island									
8.	Cliffe, north Kent									
9.	Swanscombe, north Kent									
10.	Ashford, Kent									
11.	Olympic Park legacy sites									

3.8 The original intention was to reduce the long list to a shortlist of between two and four options for more detailed evaluation. In the event, Swanscombe Peninsula performed so well that LRCH decided to focus on confirming the feasibility of that option.

3.9 It was considered that Swanscombe Peninsula offered significant advantages. These are discussed in further detail within Chapter 4: *Project development and alternatives* of the ES (document reference 6.1.4), however can be summarised as:

- A large and generally unused brownfield site with a broadly level terrain;
- Close to the edge of London but outside of the Metropolitan Green Belt;
- Proximity to Ebbsfleet International Station, which offers high speed train connections to London St Pancras International station;

- Proximity to strategic highway routes in the locality, including the A2(T) and close to Junction 2 of the M25 motorway. Moreover, the Dartford Tunnels and Queen Elizabeth II Bridge crossings of the River Thames lie approximately 3 km to the west of the site providing north/south connections;

- Absence of any international or national wildlife or heritage designations upon the Project Site; and

- Opportunity to provide significant local economic regeneration initiatives.

3.10 LRCH verified these conclusions through early discussions with landowners and the county and local authorities, supported by preliminary site investigations and conceptual design feasibility work, before deciding to announce the Swanscombe site as its preferred option for an entertainment resort.

3.11 In 2020 it was decided to extend the Project Site through the inclusion of land at Tilbury in Thurrock in order to provide an element of the London Resort's car and coach parking on the northern side of the Thames with a passenger ferry connection to the London Resort itself. The location of this additional land was not the subject of a free-standing site search and evaluation exercise along the lines of that described above. Instead, its selection was determined by its proximity to the Kent Project Site, the availability of established lightly-used passenger ferry terminal facilities surrounded by a substantial area of land already laid out for car parking, and by positive dialogue with Port of Tilbury London Limited, who had secured a DCO for its Tilbury2 expansion.

3.12 Road traffic modelling suggested that the 'Asda' Roundabout at the junction between the A1089 St Andrews Road / Dock Road, Windrush Road and Thurrock Park Way should be included in the Essex Project Site to accommodate potential highway improvements.

CONCLUSION

3.13 In proposing to make a major investment in an entertainment resort with a global profile, LRCH undertook a thorough and considered site selection process to be certain that it had selected the best site with a leading range of resort attractions. The outcome was the selection of Swanscombe Peninsula as a clear standout option when compared against the other sites and the site selection criteria.

Chapter Four ◆ Site description

OVERVIEW

4.1 The London Resort is proposed to cover an extensive area of land, principally to the south of the River Thames in the areas of Dartford Borough Council and Gravesham Borough Council, but also to the north of the river in Thurrock Council.

4.2 The following contextual information and site description is adapted from Chapter 2: *Site description* of the ES (document reference 6.1.2). The ES provides a full and detailed site description that should be referred to for further appreciation and understanding of the Project Site.

SITE CONTEXT

Location

4.3 The Project Site lies approximately 30 km east-south-east of central London on the south and north banks of the River Thames, in the ceremonial counties of Kent and Essex. On the south side of the Thames the Project Site occupies much of the Swanscombe Peninsula, formed by a meander in the river, and includes a corridor for transport connections extending generally southwards to the A2(T) trunk road. On the northern side of the river the Project Site includes areas of land east of the A1089 Ferry Road and the Tilbury Ferry Terminal, which currently provides passenger services across the river to Gravesend and incorporates the London International Cruise Terminal. It also includes the Asda Roundabout at the junction of the A1089 St Andrews Road / Dock Road, Windrush Road and Thurrock Park Way.

4.4 For clarity the section of the Project Site to the south of the Thames is referred to as the 'Kent Project Site' and that to the north of the river is identified as the 'Essex Project Site'. They are not contiguous.

The local context: Kent

4.5 The Kent Project Site is bisected by the municipal boundary between the boroughs of Dartford to the west and Gravesham to the east. It lies mostly in the designated area of the Ebbsfleet Garden City, established in March 2015. The urban areas of Stone, Greenhithe, Ingress Park and Swanscombe lie to the west and south. These are largely residential in character, with commercial uses concentrated on Stone's river frontage. To the east of the Kent Project Site lies Northfleet, a neighbourhood of mixed residential and commercial uses. Across the southern and south-eastern parts of the Peninsula is an extensive industrial area on Manor Way.

4.6 Each of these settlements has a district centre providing community, retail and commercial services. The locality is also served by the principal town centres in the two boroughs, at Dartford and Gravesend (in Gravesham). Beyond Greenhithe to the south-west of the Kent Project Site lies Bluewater Shopping Centre. This is a significant retail development that provides 154,000 m^2 of retail and leisure floorspace and 13,000 car parking spaces on a 97 ha site. In April 2017, Dartford BC resolved to grant planning permission for an expansion in total retail and catering floorspace of up to 30,000m^2. Car parking at the centre would be maintained at current levels. Construction work on the extension has yet to commence.

4.7 To the south of the A2(T) the land is more open and rural in character, with small settlements amid farmland and woodland blocks. Most of this area lies in the Metropolitan Green Belt.

4.8 The principal rail links in the locality include the High Speed One (HS1) railway, which provides high-speed connections between London and various destinations in Kent and Eurostar train connections between London, Paris, Brussels and other European cities. Ebbsfleet International Station is located to the south of Swanscombe Peninsula. The railway passes partly in cutting and partly in a tunnel beneath Swanscombe Peninsula *en route* to and from London St Pancras International Station.

4.9 The North Kent Line, which crosses the southern edge of the Swanscombe Peninsula in an east-west direction, provides local services between London and North Kent and onwards to the Kent coastal towns by way of the Kent Coast Line, with nearby stations at Greenhithe, Swanscombe and Northfleet. A part of Swanscombe station lies inside the DCO Order Limits but the stations are otherwise located outside the Kent Project Site.

4.10 Strategic highway routes in the locality include the A2(T), which provides a connection between Junction 2 of the M25 motorway to the west and Junction 1 of the M2 motorway beyond Gravesend to the east. The Dartford Tunnels and Queen Elizabeth II Bridge crossings of the River Thames lie approximately 3 km to the west of the Project Site. Highways England recently secured consent for upgrade works to the A2(T) Bean and Ebbsfleet junctions and has consulted on options for a new road between Kent and Essex, known as the Lower Thames Crossing.

4.11 The principal local roads adjacent to the Kent Project Site include the A226 London Road / Galley Hill Road that runs east-west across the southern side of the Swanscombe Peninsula, with the B255, B259 Southfleet Road and the B262 / A2260 Springhead Road providing north-south links between the A226 and the A2(T).

4.12 The locality has a distinctive landform, modified by human activity. From the low-lying southern bank of the Thames the terrain generally rises southwards to a ridge that is typically 25m above ordnance datum (AOD). However, the natural topography has been altered considerably by extensive mineral workings – principally the quarrying of chalk for the manufacture of cement and other building products. The extensive voids created by mineral extraction include Eastern Quarry to the south-west of the Kent Project Site, which is being developed as a new residential neighbourhood as part of the Ebbsfleet Garden

City initiative established by the Ministry of Housing, Communities and Local Government. Some of these former chalk pits have also been used for waste landfill, including an area to the west and north of Ebbsfleet International Station inside the Project Site. Areas of the peninsula have been tipped with substantial quantities of cement kiln dust (CKD), a by-product of the cement industry. In places this material has been over-tipped with dredgings from the River Thames.

The local context: Essex

4.13 The north bank of the River Thames opposite Swanscombe Peninsula is also extensively developed. Local settlements include West Thurrock, South Stifford, Grays and, to the north-east, the major port and town of Tilbury.

4.14 The Essex Project Site lies immediately to the east of the port of Tilbury in the unitary borough of Thurrock. Tilbury is London's primary operational port and offers over 10 km of quayside providing 56 operational births, supported by 465,000 m2 of warehouse floorspace. The Port handles a range of cargoes including Roll-on/Roll-off (RoRo), container, wood and paper products, grain and liquid and dry bulk materials. Where not developed for warehousing, the Port is mostly hard surfaced to accommodate the storage and movement of vehicles, containers and bulk materials.

4.15 On the bank of the Thames along the southern edge of the Port stand four wind turbines operated by Scottish Equity Partners. The turbines have a maximum height to blade tip of c. 135 metres and together have a generation capacity of 9.2 megawatts (MW).

4.16 At the south-east corner of the Port lies the Tilbury Ferry Terminal incorporating the London International Cruise Terminal. The cruise terminal comprises a restored grade II* listed two-storey building and a large floating landing stage extending out into the river, connected to the land by a series of bridge structures. The landing stage is included in the statutory listing. Passenger ferries to Gravesend operate from the eastern part of the terminal, which also accommodates an arts activity centre.

4.17 In February 2019 the Secretary of State for Transport made a DCO for a new port 2 km to the east of Tilbury Port, known as Tilbury2, following an application by Port of Tilbury London Limited. This development occupies the site of the former Tilbury Power Station and will include a RoRo terminal and a Construction Materials and Aggregates Terminal (CMAT), with associated infrastructure including rail and road facilities and modifications to the existing marine infrastructure. The CMAT will be used for the stockpiling of construction materials and some processing of aggregates for the production of asphalt and concrete products. Construction of Tilbury2 is underway. The Essex Project Site lies between the ports of Tilbury and Tilbury2.

4.18 On 24 June 2020 the Secretary of State for Business, Energy and Industrial Strategy accepted for examination a DCO application by Thurrock Power Limited to develop a flexible generation plant on land north of Tilbury sub-station in Thurrock. The proposed plant would provide up to 600 megawatts (MW) of electrical generation capacity on a fast

response basis, together with up to 150 MW of battery storage capacity. The main site for the Thurrock Power project is c. 2 km to the north-east of the Tilbury Ferry Terminal.

4.19 Local settlements include the towns of Tilbury, 1 km to the north of the ferry terminal, Chadwell St Mary, a further 2 km to the north, and the larger urban area of Grays, 4 km to the north-west. Strategic road access is provided by the A1089 Dock Approach Road / Dock Road / Ferry Road, which connects to the main A13 east-west route to the M25 motorway and London beyond. The surrounding countryside is either flat or gently undulating and features prominent high voltage electricity transmission lines, generally running in parallel pairs.

4.20 Tilbury lies on the railway between Southend-on-Sea and London Fenchurch Street, which passes through West Ham station at which passengers can connect to the District and Hammersmith and City lines on the London Underground and the Docklands Light Railway network. Tilbury railway station is 1.5 km from the ferry terminal.

4.21 Between the Essex Project Site and Tilbury2 lies Tilbury Fort, a star-shaped fortification managed by English Heritage and a popular local visitor destination. The fort originated in Tudor times and features angular bastions, moats and lines of guns facing onto the Thames. The site is a Scheduled Monument and contains a grade II* listed barracks.

THE KENT PROJECT SITE

4.22 The Kent Project Site comprises approximately 387.53 hectares of land in a complex shape. It includes land on and to the south of the Swanscombe Peninsula on which the London Resort and its main public transport interchange would be focused, and a corridor of land required for road connections running in a broadly north-south direction between the Peninsula and the A2(T). The Kent Project Site also includes a section of the A2(T) corridor approximately 3.5 km in length between the established junctions at Bean in the west (A2(T) / B255) and Pepper Hill (A2(T) / B262) in the east.

4.23 The majority of the Kent Project Site on the Swanscombe Peninsula comprises open, low-lying land with extensive former Chalk Kiln Dust (CKD) tips and other brownfield former industrial land. A number of drains, filtration systems, aeration lagoons and other features are also present. Much of the Peninsula has re-vegetated naturally but areas of bare ground remain. Other parts of the Kent Project Site on the Swanscombe Peninsula include the existing Manor Way, Northfleet and Kent Kraft industrial estates.

4.24 The HS1 railway crosses the Peninsula on a south-east to north-westerly alignment. The southern section is in cutting and the remainder in a tunnel. A pumping station used for the management of ground water levels is located to the north-east of the tunnel portal.

4.25 The Swanscombe Peninsula supports extensive areas of marshland including Black Duck Marsh, Botany Marsh and a marsh around the HS1 tunnel portal. Broadness Marsh at the northern tip of the Peninsula was historically a saltmarsh, but now has a raised terrain as a result of CKD tipping and the deposition of river dredgings. Broadness and Botany Marshes are bordered in part by industrial uses.

4.26 The Peninsula has an irregular topography because of historical CKD tipping activities and the deposition of dredgings from the River Thames. Two raised areas of tipped material rise to over 12-13 m above ordnance datum (AOD). A large part of the north of the Peninsula has been raised from an assumed original height of 2-3 m AOD to approximately 8.75 m AOD. Where it meets the River Thames, the Peninsula is surrounded by flood defence embankments and terraces that rise to approximately six metres AOD. Small areas of remnant salt marsh are located at the base of the flood defences.

4.27 In terms of its underlying geology, the Kent Project Site lies in the eastern part of the London Basin, which is underlain by chalk. This chalk is designated by the Environment Agency as a principal aquifer and is the main source of potable water in the area. The majority of the Kent Project Site thus lies within a groundwater Source Protection Zone (SPZ). The Peninsula itself is overlain by alluvium, comprising silts and clays.

4.28 The banks of the Peninsula feature occasional jetties and inlets, some of which are used for the mooring and landing of boats. An inlet at the northern end of the Peninsula, known as Broadness Creek, has associated boat sheds.

4.29 A small number of public footpaths cross the Kent Project Site including Saxon Way, which runs along the western flood embankment.

4.30 High voltage electricity transmission lines cross the Peninsula on a south-east to north-westerly alignment, and include a 190 m tall 'super pylon', constructed in 1965, that lifts the transmission lines over the Thames to a similar tower on the northern bank. These lattice towers are of interest from an industrial heritage perspective, being the UK's tallest electricity pylons, and are prominent local landmarks.

4.31 Other features of industrial and cultural heritage interest in the Kent Project Site include Bell Wharf and White's Jetty on the western shore of the Swanscombe Peninsula. White's Jetty is an early example of precast concrete construction and provided deep water access for the former Associated Portland Cement Manufacturers Limited's cement factory on the peninsula, which closed in 1990. The jetty is abandoned and has become a roost for sea birds.

4.32 The most significant heritage and geological feature in the Kent project site is Baker's Hole to the north-west of Ebbsfleet International Station, where quarrying and other excavations yielded a wealth of large flint hand axes and flakes, representing the discarded remains of stone tool production by a population probably consisting of Neanderthals active in the early-middle Palaeolithic period, c. 250,000 years ago. Baker's Hole is both a Scheduled Monument and a Site of Special Scientific Interest (SSSI).

4.33 North of the HS1 tunnel portal is a derelict wastewater treatment works. A Port of London Authority radar beacon is located near the northern tip of the Peninsula.

4.34 Natural habitats on the Kent Project Site include patches of woodland, scattered areas of scrub and improved and semi-improved grassland. Wetland habitats include wet grasslands at Black Duck Marsh and grazing marsh and reed beds in Black Duck and Botany

Marshes, with ponds of standing open water and drainage ditches. There are also fragments of saltmarsh and mudflats within the flood defence embankments.

4.35 The Kent Project Site does not contain any international or national wildlife designations. Much of Botany Marsh is a Local Wildlife Site (LWS) and part of the Ebbsfleet Marshes Local Wildlife Site, which includes wet woodland and reed beds, is located in the Ebbsfleet Valley section of the Kent Project Site. In November 2020 Natural England issued a pre-notification letter regarding the potential for a significant part of the Swanscombe Peninsula as a potential Site of Scientific Interest (SSSI).

4.36 Areas of degraded post-industrial land, including disused pits and landfilled areas supporting mostly grassland and scrub, are present across the section of the Kent Project Site that extends southward towards the A2(T). This area also contains a large surface level car park and associated roads serving Ebbsfleet International Station.

4.37 The A2(T) / A2260 junction (referred to here as Ebbsfleet Junction) allows eastbound and westbound traffic to leave and join the A2(T) at the southern end of the Kent Project Site. Springhead Nurseries and the HS1 railway are located to the immediate east of the A2(T) / A2260. A former electricity compound located immediately to the west is currently being developed for housing, a school and a hotel.

4.38 The Pepper Hill (A2(T) / B262) junction provides access to Northfleet to the north and Northfleet Green, Southfleet and Betsham to the south. The (A2(T) / B255) junction at Bean provides connections to Stone and Greenhithe via the B255 and the A296. Blocks of woodland border the A2(T) at the A2(T) / B255 junction. Bluewater Shopping Centre is located less than 1 km from this junction and is reached directly from the B255. At Greenhithe the B255 connects to the A226, which provides access to the Swanscombe Peninsula from the west.

Site and area planning history

4.39 The planning history of land within the Order Limits is complex and plentiful. For this reason, the planning history summary below does not seek to be exhaustive or definitive but instead seeks to capture the key elements. Omission or inclusion of a particular planning history is not therefore intended to signify any greater or lesser relevance to the London Resort. As part of the cumulative impact assessment undertaken through the Environmental Impact Assessment process, and reported in Chapter 21: *Cumulative, in-combination and transboundary effects* of the ES (document reference 6.1.21), detailed consideration has been given to a number of allocated and consented schemes.

4.40 Swanscombe Peninsula has considerable planning history relating to former industrial uses, including those involving depositing landfill and the tipping of various forms of waste. There is also notable planning history relating to, and associated with, the construction of the Channel Tunnel Rail Link tunnel which passes through and beneath the site.

4.41 In 2004, an outline planning application was submitted for much of the western side of the Swanscombe Peninsula for a mixed development comprising up to 1,750 mixed dwellings, office, general industry, warehousing, retail, financial and professional services, restaurants, primary school, community hall, health centre, sports and leisure facilities, Fastrack station and bus depot (DBC reference DA/04/00587/OUT and DA/05/00286/OUT). It is understood that planning and transport issues meant the applications were subsequently withdrawn.

4.42 A planning application was submitted in 2004 and approved in 2008, for residential development on a Lafarge Cement UK site at the Corner of London Road and Craylands Lane (south of London Road) (ref. 04/00670). The development has not been implemented.

4.43 Within the general industrial and employment areas within/around the industrial estates surrounding Manor Way Business Park and London Road there have been a number of applications over the years for industrial and employment operations, including the development of new units. Of particular note, in June 2013 a planning application was submitted to Kent County Council for renewable energy facility at Manor Road Business Park (KCC reference KCC/DA/0201/2013). LRCH was actively involved in objecting to this application, alongside other statutory consultees, on the basis of prejudicing the regeneration of the Swanscombe Peninsula and the delivery of the London Resort. The application was subsequently 'called-in' by the SoS and following adjournment of the resultant Public Inquiry withdrawn by the applicant in 2015. More recently, Westgate Power secured planning permission for the construction and operation of a 5 MW Flexible Energy Facility and associated ancillary equipment on land to the north of Galley Hill Road (EDC reference EDC/20/0042).

4.44 Before and since the establishment of EDC, there has been an extensive number of planning and related applications for residential development within the Ebbsfleet Garden City area and beyond. This includes significant residential development at development areas known as Eastern Quarry, Ebbsfleet Green, Northfleet Embankment, Springhead Park, Ingress Park, Former Croxton & Garry and Craylands. For example, in 2013 planning permission was granted by DBC for the area known as the Eastern Quarry, one of the largest residential developments within the EDC. This permission allowed for a mixed use development of up to 6,250 dwellings in addition up to 231,000 sqm of built floorspace across a wide variety of uses, including (former) Use Classes A1-5, B1, D1, D2, and C1.[2] The development also includes open space provision, highways and public transport facilities, and facilities for mooring, launching and landing watercraft.

4.45 The area surrounding Ebbsfleet Central also offers a detailed and complex planning history. The area has an existing outline planning consent for a substantial mixed use development of up to 3,200 homes, retail and employment floorspace and supporting community and education facilities (GBC reference GR/1996/0035 and DBD reference DA/96/00047/OUT). The application proposed up to 789,550m^2 of mixed-use

[2] The Town and Country Planning (Use Classes) Order 1987 (as amended) was subject to significant overhaul in July 2020

development. There has been various amendments and variations but there remains an extant outline planning permission at Ebbsfleet Central for extensive commercial-led mixed-use development (DBC reference DA/15/00351/VCON and GBC reference 20150155). The planning history around Ebbsfleet Central is complex with multiple applications for reserved matters, amendments and discharge of conditions in respect of the development. The EDC has commissioned a new masterplan for the Ebbsfleet Central area which is anticipated to result in an outline planning application in summer 2021 for a new range of uses.

4.46 A short distance to the west of the site falls the Bluewater Shopping Centre. The regionally significant shopping centre has been the subject of various applications for extensions, improvements and alterations over the years, including most recently an application for a tunnel connecting Bluewater Shopping Centre to the residential area of Eastern Quarry (KCC reference KCC/DA/0232/2019).

4.47 To the southern end of the Order Limits, in June 2020, the SoS provided notification to Highways England that the A2 Bean and Ebbsfleet junction improvements scheme could proceed to construction. It is understood enabling works commenced in March 2020.

4.48 To the south east of the Order Limits, planning permission was granted in June 2017 for redevelopment of Ebbsfleet United Football Club's ground relating to the demolition of the Plough End Stand and ancillary buildings and erection of a replacement Stand (Phase 1B), integrated 55-bedroom hotel together with new access, parking and ancillary facilities (GBC reference 20170221).

THE ESSEX PROJECT SITE

4.49 The Essex Project Site comprises approximately 25.54 hectares of land in a complex shape. It includes the following main elements.

- A trapezoidal area of level hard-surfaced land used currently for vehicle storage. This area is bounded by railways on its northern and western sides, and a drainage channel to the east. Road access is gained from Fort Road at the south-eastern corner of the Essex Project Site. To the south lies Tilbury Railport, a large logistics shed with railway sidings operated by Maritime Transport Limited.

- An irregular strip of land along the corridor of the A1089 Ferry Road, including areas of vegetation and hard standings, and along the corridor of Fort Road to the east and far as the entrance into the main car storage site described in the previous bullet.

- The Tilbury Ferry Terminal and the eastern half of the floating landing stage out in the river, including connecting bridges and a small triangular area of open space to the east. The open space falls outside of the Order Limits.

- The Asda Roundabout on the A1089 to the north. This roundabout forms the junction between the A1089 St Andrews Road / Dock Road, Windrush Road and Thurrock Park Way, the latter of which serves an Asda superstore. This junction has been included

in the draft Order Limits for the London Resort DCO in the event that traffic assessment reveals a need for physical highway enhancements at this location.

4.50 The London International Cruise Terminal, the passenger ferry terminal and the floating landing stage that serves both are together listed grade II*.

Site and area planning history

4.51 The Essex Project Site has a much more limited planning history to that of the Kent Project Site. Planning history within the Order Limits itself in recent years is largely limited to various listed building consents for relatively modest works to the London International Cruise Terminal, Tilbury Riverside Station and Tilbury Ferry Landing Stages.

4.52 Abutting the site, planning permission was granted in June 2020 for the Riverside Business Centre for the expansion to include the provision of 20 new business units and associated car parking, following an earlier approval in 2016 (Thurrock reference 19/01837/TBC).

4.53 In February 2019, the SoS granted development consent and made a DCO for Tilbury2, a significant port expansion by Port of Tilbury London Limited. The DCO allows for a new port facility acting alongside the existing Port of Tilbury. The scheme involves the extension of existing jetty facilities and the dredging of berth pockets in the River Thames, and land works and facilities for a "Roll-On / Roll-Off" terminal, a facility for importing and processing bulk construction materials, areas of external storage and the construction of road and rail links.

4.54 There is a current application for a DCO for a Flexible Generation Plant, by Thurrock Plant Ltd. This was accepted for examination by the PINS in June 2020. The Preliminary Meeting was held in October 2020. There are separate proposals for a Tilbury Energy Centre, although it is understood a decision has been taken by the developer to 'freeze' progress on the development.

4.55 An outline planning application for Thames Enterprise Park is currently under consideration (Thurrock reference 18/01404/OUT). The site represents one of six 'growth hubs' identified within Thurrock following the closure of the Coryton Oil Refinery in June 2012. The application relates to the demolition, phased remediation and redevelopment of 167 hectares of former oil refinery land to the east of the site, approximately halfway between Tilbury and Southend-on-Sea. The development looks to provide up to 480,000 sqm of commercial development, energy and waste related facilities and a Central Hub incorporating a range of active uses, amongst other matters. Additional and revised material was submitted in December 2019. It is understood there are a number of outstanding concerns, relating to transport and other matters.

CONCLUSION

4.56 The Project Site lies approximately 30 km east-south-east of central London on the south and north banks of the River Thames. The land within the Order Limits falls within the administrative boundaries of Dartford, Gravesham and Thurrock. The Order Limits land

covers an area totalling some 413.07 ha, split 387.53 ha south of the River Thames in the Kent Project Site and 25.54 ha north of the River Thames in the Essex Project Site.

Chapter Five ◆ Project description

OVERVIEW

5.1 The Planning Act 2008 provides that development consent may be granted for both a Nationally Significant Infrastructure Project (NSIP), referred to as the 'Principal Development' in this Statement, and for 'Associated Development', which is development associated with the Principal Development. The Housing and Planning Act 2016 enabled DCO development to be accompanied by 'Related Housing', defined by functional need or geographical proximity, with a guideline maximum of 500 dwellings to be consented by this means. Parts 1 (NSIP) (i.e. Principal Development) and 2 (Associated Development) of Schedule 1 to the *draft DCO* (document reference 3.1) describe (by reference to the work numbers shown on the *Works Plans* (document reference 2.5) the full extent of the 'Principal Development' and 'Associated Development' respectively.

5.2 In the description of development below, a distinction is made between the Principal Development, which comprises all works proposed within what would be the Entertainment Resort, and Associated Development, comprising other development that has a direct relationship with the Principal Development and is required to support its construction or operation[3].

5.3 A more detailed project description is set out within Chapter 3: *Project description* of the ES (document reference 6.1.3) and should be referred to for a greater understanding of the constituent parts. The chapter provides an overview of the proposals and proceeds to describe the individual elements and features of the London Resort and supporting infrastructure.

PRINCIPAL DEVELOPMENT

5.4 In summary, the Principal Development includes:

- the Leisure Core, comprising a range of events spaces, themed rides and attractions, entertainment venues, theatres and cinemas. The main theme parks would be developed in landscaped settings in two phases known as Gate One and Gate Two;
- a covered market and ancillary facilities with retail, dining and entertainment facilities;
- terrain remodelling, hard and soft landscape works, amenity water features and planting;

[3] Associated development is defined in Annex A of the Department for Communities and Local Government Guidance on associated development applications for major infrastructure projects (April 2013)

- guest facilities;
- the construction of two internal visitor entrance areas comprising ticketing point and ancillary commercial uses;
- pedestrian and cycle access routes and related infrastructure;
- service and emergency service vehicle routes and associated facilities; and
- construction of a temporary remediation processing compound.

ASSOCIATED DEVELOPMENT

5.5 In summary, the Associated Development includes:

- The construction of up to four multi storey parking buildings with drop-off and taxi provision as part of a maximum provision of 10,750 car spaces[4], 200 coach parking spaces and overflow coach parking, 350 motorcycle spaces and 250 secure cycle spaces for visitors;
- four hotels providing family, upmarket, luxury and themed accommodation totalling up to 3,550 suites or 'keys' with ancillary uses. One hotel will incorporate access to an enclosed Water Park;
- Highway works comprising works to the A2(T) to provide a junction connecting the A2(T) with the road leading to the Entertainment Resort and associated works related to the safeguarding and diversion of underground utility connections in that area;
- a 'Conferention' Centre (i.e. a combined conference and convention centre) capable of hosting a wide range of entertainment, sporting, exhibition and business events;
- the Coliseum designed to host e-Sports, video and computer gaming events and exhibitions;
- a 'Back of House' area accommodating many of the necessary supporting technical and logistical operations to enable the Entertainment Resort to function, including administrative offices, a security command and crisis centre, maintenance facilities, costuming facilities, employee administration and welfare, medical facilities, offices and storage facilities, internal roads, employee car parking, a visitor centre and staff training facility, and landscaping;
- the construction of staff accommodation of up to 500 dwellings, including associated vehicle, cycle and pedestrian routes, shared workspace and multifunctional spaces,

[4] Broken down as 10,000 visitor, 500 staff and 250 VIP

small scale retail facilities for residents, outdoor and indoor amenity space, landscape works and related ancillary works;

- an operations resource centre;
- a people mover, transport interchanges and associated facilities;
- a Resort Access Road of up to four lanes (i.e. up to two lanes in each direction) and associated works;
- local transport links;
- river transport infrastructure on both sides of the Thames, including the extension of the existing floating jetty at the Tilbury ferry terminal, a new floating jetty, the reconditioning of Bell Wharf at the Swanscombe Peninsula, and related dredging and ancillary works;
- utility compounds, plant and service infrastructure including an energy centre, district cooling and heating plant;
- a wastewater treatment works with associated sewerage and an outfall into the River Thames;
- flood defence and drainage works;
- habitat creation and enhancement and public access;
- security and safety facilities; and
- data centres to support the London Resort's requirements.

RELATED HOUSING

5.6 As noted previously, the Planning Act 2008 was amended by Section 160 of the Housing and Planning Act 2016 to allow for the inclusion of dwellings within the NSIP process where there is a functional need and they are in geographical proximity to the project, and associated Guidance[5] limits this to 500 dwellings.

5.7 As a result, the Project will include Related Housing comprising up to 500 dwellings for employees at the London Resort. The dwellings will typically comprise 4-6 bedroom apartments. Further detail on the nature of the proposed dwellings is set out in Chapter eight of this Statement.

[5] Planning Act 2008: Guidance on Nationally Significant Infrastructure Projects and Housing (DCLG, March 2017)

CONCLUSION

5.8 This chapter has sought to provide an overview of the project description for the Proposed Development, constituting Principal Development, Associated Development and related housing. A more detailed project description is provided in Schedule 1 to the *draft DCO* (document reference 3.1) and Chapter 3: *Project description* of the ES (document reference 6.1.3).

5.9 The Project Description contained herein does not seek to be exhaustive and in all cases the information provided within the *draft DCO* (document reference 3.1) and/or the various DCO Plans prevails.

Chapter Six ◆ Legislation, planning policy, guidance and other documents

OVERVIEW

6.1 This chapter seeks to provide an overview of the prevailing legislative, planning policy and guidance context relevant to the London Resort. It seeks to establish the national, regional and local picture relevant to the assessment of NSIPs and other material considerations. It does not seek to be exhaustive and identify every aspect of legislation and policy. As such, the omission of legislation, policy or guidance documents does not necessarily indicate they are of no relevance or have not been considered in the progression and submission of the DCO application. Likewise, the inclusion of a policy document does not indicate or convey its significance in the decision-making process in relation to the DCO application.

6.2 Owing to the significant volume of material, in certain instances further information, such as summaries of large documents and numerous planning policies, are appended to assist the reader and prevent excessive text within this chapter. The reader should refer to these appendices or the original documents for a fuller understanding of matters presented but, in all cases, should familiarise themselves with the original document.

6.3 The reader is also directed to Chapter 5: *Relevant law and policy* of the ES (document reference 6.1.5) and the technical chapters within for further details of relevant law and policy in the undertaking of the EIA.

PRIMARY LEGISLATION

Planning Act 2008

6.4 The Planning Act 2008 (the 2008 Act) created a new development consent regime for major infrastructure projects in the fields of energy, transport, water, wastewater and waste. The intention of the Planning Act 2008 was to speed up the delivery of nationally significant infrastructure projects through a consenting process that incorporates:

- extensive pre-application consultation;
- a 'front-loaded' design and EIA process with limited scope to amend a proposal once an application is submitted;
- the incorporation of a wide range of consents and authorisations in a single DCO application in addition to planning permission, including the compulsory purchase of land;

- a clearly timetabled process for examining the application once submitted; and
- applications determined in accordance with national policy statements approved in Parliament.

6.5 The 2008 Act was amended by the Localism Act 2011, which transferred responsibility for determining DCO applications from an Infrastructure Planning Commission to the relevant Secretary of State (SoS). Applications are administered by the Planning Inspectorate on the Secretary of State's behalf. The relevant Secretary of State will thus determine NSIPs, having regard to the recommendations of the Planning Inspectorate in its capacity as the 'Examining Authority'

Growth and Infrastructure Act 2013

6.6 The Growth and Infrastructure Act 2013 (the 2013 Act) sets out a series of reforms intended to reduce the red tape that the Government considers hampers business investment, new infrastructure and job creation. As noted previously, Section 26 of the Growth and Infrastructure Act 2013 amended the Planning Act 2008 to enable certain types of 'business or commercial projects' falling within a prescribed description to be authorised under the planning regime that applies to NSIPs.

Housing and Planning Act 2016

6.7 Section 160 of the Housing and Planning Act 2016 (the 2016 Act) further amended the 2008 Act to allow for the inclusion of 'related housing development' within the NSIP process where there is a functional need and they are in geographical proximity to the project.

SECONDARY LEGISLATION

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

6.8 Amongst other matters, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 2009 Regulations) prescribe various matters in connection with the making of an application for development consent. The regulations set out the procedural requirements for publicising a proposed application, the making of an application itself, the procedural requirements for publicising the application once it has been accepted and what needs to be done when an order requires compulsory acquisition of land.

Infrastructure Planning (Business or Commercial Projects) Regulations 2013

6.9 The Infrastructure Planning (Business or Commercial Projects) Regulations 2013 (the 2013 Regulations) widened the type of project that can be consented under the 2008 Act to include a specified range of business, commercial and leisure projects. In March 2014 LRCH wrote to the Secretary of State for Communities and Local Government to request a direction allowing the London Paramount project (as it was then known) to be treated

as development of national significance, for which development consent is required under section 35 of the 2008 Act.

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

6.10 For projects requiring development consent under the 2008 Act, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 Regulations) are applicable. These regulations set out the procedural requirements for undertaking an EIA. Regulation 8 enables a party intending to make a DCO application to ask the decision-maker to state in writing its opinion as to the information that should be provided in the ES.

NATIONAL PLANNING POLICY

National Policy Statements

6.11 National Policy Statements (NPS) are produced by Government and comprise the Government's objectives for the development of nationally significant infrastructure in a particular sector and state. They also include any other policies or circumstances that ministers consider should be taken into account in decisions on infrastructure development. NPS undergo a democratic process of public consultation and parliamentary scrutiny before being designated (i.e. published). They provide the framework within which Examining Authorities make their recommendations to the Secretary of State.

6.12 There is no NPS for business or commercial projects nor has there been any intention to produce one. However, the contents of a number of other NPSs establish the principle of overarching issues that can also be associated with a commercial and leisure related development, such as the London Resort. These are discussed in the subsequent sections.

NPS for National Networks (December 2014)

6.13 This NPS sets out the need for, and Government's policies to deliver, the development of nationally significant road and rail network infrastructure in England. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination of applications by the Examining Authority and decisions by the Secretary of State.

6.14 Chapter three of this NPS summarises Government policy on national networks, including the need to take into account the positive and negative social and environmental impacts of transport infrastructure and the Government's general approach to safety, the reduction of emissions and the uptake of new transport and traffic management technology. Chapter four of this NPS identifies assessment principles for road and rail infrastructure. Chapter five sets out general policy in respect of the assessment, mitigation and examination of generic impacts, including air quality, carbon emissions, biodiversity, landscape, noise, flood risk and the wider impact on transport networks.

NPS for Ports (January 2012)

6.15 The NPS for Ports provides the framework for decisions on proposals for new port development. It is also a relevant consideration for the Marine Management Organisation, established in the Marine and Coastal Access Act 2009, which decides other port development proposals, and for local planning authorities where they have a role to play.

6.16 The NPS for Ports is considered potentially to be a relevant consideration as the London Resort has a significant marine dimension, involving development on both sides of the River Thames and a substantial reliance on river transport for the movement of construction materials, the supply of goods for the operational resort and the ferrying of visitors and staff to and from central London and the Port of Tilbury when operational.

6.17 More specifically with regards to tourism and leisure, paragraph 3.1.6 notes:

'Sea ports play an important role in the tourism and leisure industries, supporting many different forms of economic and social activity, including passenger cruise liners, Channel ferries, sea going yachts and dinghies.'

National Planning Policy Framework (February 2019)

6.18 The National Planning Policy Framework (NPPF) (February 2019) sets out the Government's planning policies for England and how these are expected to be applied. The document covers a wide variety of planning matters, providing advice to Local Planning Authorities (LPA) on plan making and decision making (development management).

6.19 NPPF paragraph 5 advises that:

'The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications'

6.20 In the absence of a NPS for business and commercial developments, Section 105 of the Planning Act 2008 instructs the SoS to have regard to specific matters, including matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision. This is likely to include overarching matters of national policy, including those set out within the NPPF. For this reason, the content and direction of the NPPF is considered of particular relevance to the assessment of the London Resort.

6.21 The NPPF covers a large range of issues across its chapters, including achieving sustainable development; decision-making; building a strong, competitive economy; promoting healthy and safe communities; promoting sustainable transport; achieving well-designed

places, meeting the challenge of climate change, flooding and coastal change; and conserving and enhancing the natural and historic environments.

6.22 The overarching theme within the NPPF, as neatly captured within Paragraph 10, is one of a *'presumption in favour of sustainable development.'* A summary of some key aspects found within each thematic chapter of the NPPF is provided at Appendix 3.0.

6.23 The NPPF is also supported through the National Planning Practice Guidance (NPPG) which provides relevant topic-based guidance. The NPPG can be helpful on detailed matters of development management under the Town and Country Planning Act 1990 but does not provide commentary in respect of the processing of DCOs. The NPPG is therefore considered of limited relevance to this application.

Other national policy documents

UK Marine Policy Statement (March 2011)

6.24 The Order Limits extend to include parts of the River Thames. As such, matters relating to marine planning are pertinent to the consideration of the DCO application. Under Section 104(2)(aa) of the 2008 Act, the Secretary of State must have regard to the UK Marine Policy Statement (September 2011) in determining a NSIP application where a NPS has effect.

6.25 The UK Marine Policy Statement aims to contribute to the achievement of sustainable development in the United Kingdom marine area and is the framework for the preparation of Marine Plans and for decisions affecting the marine environment. It was prepared and adopted for the purposes of Section 44 of the Marine and Coastal Access Act 2009.

6.26 In April 2020 the Marine Management Organisation (MMO) completed a final consultation on the South East Marine Plan before submitting it to the Secretary of State for Environment, Food and Rural Affairs for adoption. The draft plan adopts an integrated approach to the management of the marine environment, taking into account fishing, marine aggregates, marine energy developments, biodiversity, tourism and recreational demands.

6.27 Once published as a Consultation Draft, Marine Plans become a material consideration and upon adoption become statutory.

Government Review of Waste Policy in England (2011)

6.28 The document identifies a case for action towards a 'zero waste economy'. The document considers matters such as the 'waste hierarchy' and the role for Government and society.

6.29 The document continues and identifies topics such as the sustainable use of materials and waste prevention; regulation and enforcement; empowering local communities; food waste; energy recovery; landfill and infrastructure and planning.

National Waste Management Plan for England (2013)

6.30 The plan provides an analysis on waste management in England, bringing current and planned waste management policies together in one place following the Government Review of Waste Policy in England (2011) and the requirements of Article 28 of the Waste Framework Directive[6] which requires one or more waste management plan.

6.31 The Waste Management Plan for England is a high-level document which is non–site specific. It provides an analysis of the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Waste Framework Directive.

6.32 The document identifies that the way in which waste is managed has changed dramatically over the last twenty years in the UK, reflecting a change in attitude towards waste management. The document identifies that landfill waste has been reducing alongside an increase in recycling.

6.33 The key aim of the waste management plan for England is to set out how a zero-waste economy can be achieved as part of the transition to a sustainable economy. In particular, the document identifies an effective use of the 'waste hierarchy' (prevention, re-use, recycling, recovery and finally disposal as a last option).

National Planning Policy for Waste (October 2014)

6.34 This policy sets out how planning applications relating to waste should be determined by waste planning authorities. With regards to applications for non-waste development, paragraph 8 requires that LPAs ensure:

- The likely impacts of such development on existing waste management facilities and on sites allocated for waste management are acceptable and does not prejudice the waste hierarchy and/or efficient operation of such facilities;
- New non-waste development makes sufficient provision for waste management and promotes good design. This extends to providing adequate storage facilities; and
- The handling of waste arising from construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal.

Draft Waste Management Plan for England (August 2020)

6.35 The Government recently held a consultation on the draft Waste Management Plan for England, a requirement every six years under the Waste (England and Wales) Regulations 2011. The draft document provides an analysis of current waste management activity in

[6] Directive 2008/98/EC

England focussing primarily on the quantity of waste and how this is managed in England. The Plan summarises current waste management policies.

Noise Policy Statement for England (March 2010)

6.36 The aim of this document is to provide clarity regarding current policies and practices to enable noise management decisions to be made within the wider context, at the most appropriate level, in a cost-effective manner and in a timely fashion.

6.37 The premise of the document is a vision of

'Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.'

6.38 To achieve this vision, the document sets out noise policy aims that, through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development, will avoid significant adverse impacts on health and quality of life; mitigate and minimise adverse impacts on health and quality of life; and where possible, contribute to the improvement of health and quality of life.

REGIONAL PLANNING POLICY

London Plan (March 2016)

6.39 Although the Project Site falls outside of Greater London, it demonstrates a clear relationship with it and the proposals seek to maximise from the relatively short distance from Central London. For this reason, there is merit in acknowledging the general background and thrust of the document. However, for the avoidance of doubt, the London Plan does not have development plan status in respect of the Project Site.

6.40 The London Plan was updated in March 2016 and provides the overall strategic plan for London and the framework for the development and use of land in London. In a similar manner to the NPPF, the London Plan encourages opportunities for development to increase competitive attractiveness, including of outer London and for new sectors or those with the potential for step changes in output. Policy 2.7, among other criteria, is notable in that it expects that planning decisions give appropriate weight to the wider economic, as well as more local environmental and other objectives, when considering business development proposals.

New London Plan

6.41 The Mayor of London is preparing a New London Plan which will replace the adopted London Plan (March 2016). The New London Plan was subject to examination in Q1 2019 and the Mayor had released an 'Intend to Publish' version in December 2019. The Secretary of State (SoS) made a series of recommendations, the majority of which have been accepted by the Mayor whilst others have been rejected. In April 2020 a further

letter was sent from the Mayor confirming the intention to make some, but not all, of the recommendations. By law the Mayor cannot adopt the New London Plan unless he satisfies the SoS that he has made the modifications necessary to conform to the Directions, or the Directions are withdrawn. This leaves the Mayor in a position of having to either make changes he has previously resisted for it to be adopted or persuade the SoS to modify or withdraw the Directions.

6.42 It is noted that a number of the draft Intend to Publish London Plan polices follow the general policy approach and guidance as the current London Plan, and has the same aspirations for economic growth.

London Infrastructure Plan 2050: A Consultation (July 2014)

6.43 Prepared by the Mayor of London, the London Infrastructure Plan 2050 is the first ever attempt to identify, prioritise and cost London's future infrastructure to 2050, given London's growth. It is accompanied by a number of supporting documents.

LOCAL PLANNING POLICY

Development plan overview

6.44 Section 70(2) of the Town and Country Planning Act 1990 requires the decision-maker

'in dealing with an application for planning permission or permission in principle the authority shall have regard to

(a) the provisions of the development plan, so far as material to the application…'

6.45 Section 38(6) of the Planning and Compulsory Planning Act 2004, adds to this, stating that

'If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'

6.46 As a consequence, both requirements work together in the determination of planning applications under the 1990 Act. However, this is not engaged in decisions on whether to grant a Development Consent Order under the Planning Act 2008. Nonetheless, LRCH acknowledges that an up to date development plan can provide valuable information on local planning, land use and environmental considerations that may assist in the assessment and determination of the DCO and the SoS thinks relevant and important to his decision, in accordance with Section 105 of the Planning Act 2008.

6.47 Development plan documents have been produced by:

- Dartford Borough Council (DBC);
- Gravesham Borough Council (GBC);

- Kent County Council (KCC); and
- Thurrock Council (TC).

6.48 In addition to these local authorities, the Ebbsfleet Development Corporation (EDC) also falls to be considered, as it has important planning powers in its administrative area. It has prepared documents which, although capable of being important material planning considerations, are not statutory development plan documents.

6.49 The structure of local Government varies between these authorities. South of the River Thames there is a two-tier structure, with DBC and GBC being district authorities with KCC being the county planning authority. Responsibilities for services are split between the two tiers. In addition, in April 2015, the Ebbsfleet Development Corporation was set up by the Government to deliver up to 15,000 homes and create a 21st century garden city, known as Ebbsfleet Garden City. EDC's area includes land within the boundaries of DBC and GBC and contains a number of strategic sites, including the Swanscombe Peninsula. EDC has development management responsibilities across its area. North of the River Thames, Thurrock Council is a unitary authority, bordered by areas administered by other district councils and Essex County Council.

6.50 Planning policy and development management responsibilities for each of these local authorities are set out in Table 6-1 below.

Table 6-1: Planning policy and development management responsibilities

Authority	Type	Planning policy			Development management		
		General	Minerals	Waste	General	Minerals	Waste
DBC	Borough (District)	Y	N	N	Y	N	N
GBC	Borough (District)	Y	N	N	Y	N	N
EDC	Development Corporation	N	N	N	Y	Y	Y
KCC	County	N	Y	Y	N	Y	Y
TC	Unitary authority	Y	Y	Y	Y	Y	Y

6.51 An overview of the relevant development plan documents is provided in the following paragraphs and summarised in Table 6-2. An overview of individual policies is provided at Appendix 4.0 while Appendix 5.0 provides a thematic matrix of the local planning policy, helping to identify relevant policies by theme.

6.52 Several local authorities are also progressing new development plan documents, and these emerging plans have been considered during the design and assessment of the London Resort proposals where relevant. Appropriate weight should be given to draft documents according to their status and stage in preparation.

Dartford Borough Council

6.53 DBC is a district-tier council and the local planning authority. Responsibilities for highways and mineral and waste planning remain with Kent County Council. The current development plan documents are as follows:

- Dartford Core Strategy (September 2011); and
- Dartford Development Policies Plan (July 2017).

6.54 The Dartford Local Plan Policies Map (July 2017) illustrates geographically the relevant policies and sites as set out in the above documents.

6.55 Paragraph 2.6 of the Dartford Development Policies Plan states that:

'The 'London Resort' leisure proposal is located in the EDC area at Swanscombe Peninsula. This is expected to be considered as a National Significant Infrastructure Project (NSIP) and be determined directly by the Planning Inspectorate.'

6.56 DBC is producing a new local plan covering the period to 2036. A preferred options public consultation (a 'Regulation 18' consultation) was held in January – February 2020, setting out emerging proposals alongside alternative approaches.

6.57 As noted above, a high-level overview of relevant policies is provided at Appendix 4.0.

Gravesham Borough Council

6.58 GBC is a district-level authority and the local planning authority. Responsibilities for highways and mineral and waste planning remain with Kent County Council.

6.59 The current development plan documents are as follows:

- Gravesham Local Plan Core Strategy (September 2014); and
- Gravesham Local Plan First Review (Saved Policies) (November 1994).

6.60 The Gravesham Local Plan Core Strategy Policies Map (September 2014) illustrates geographically the relevant policies and sites as set out in the above documents.

6.61 GBC completed a review of its planning policies in September 2019. Only one policy, 'Policy CS02: Scale and distribution of development', was found to require modification.

6.62 GBC is currently undertaking a Partial Review of the Gravesham Local Plan Core Strategy to also include Part 1: Local Plan Core Strategy Partial Review and Site Allocations Document (October 2020) and Part 2: Draft Development Management Policies Document (October 2020). A consultation period ran from 23 October to 31 December 2020. LRCH made representations promoting the Project Site through a number of policies and the 'call for sites'.

6.63 As noted above, a high-level overview of relevant policies is provided at Appendix 4.0.

Ebbsfleet Development Corporation

6.64 The EDC assumed responsibility for some planning functions in its area on 1 July 2015, as set out within the Ebbsfleet Development Corporation (Planning Functions) Order 2015. The Designated Garden City area includes much of the Swanscombe Peninsula, the Ebbsfleet Valley to the south, Eastern Quarry and two smaller areas on the banks of the Thames at Northfleet and Gravesend. Whilst the EDC has development management functions and a masterplanning role for its area, it does not prepare statutory development plan documents but primarily relies upon the development plan context formed by DBC, GBC and KCC to determine planning applications submitted to it.

6.65 Notwithstanding the above, in 2017, EDC published the Ebbsfleet Garden City Implementation Framework (EIF) (2017) which is used as a material planning consideration in the determination of planning applications. LRCH was involved in the Ebbsfleet Garden City Vision and Masterplanning Working Group.

6.66 The EIF identifies a large central area of Swanscombe Peninsula as *'Land subject to London Entertainment Resort NSIP process'* and proposes that the marshes and other open land around it should be *'an open estuarine ecological park'*.

6.67 As noted above, a high-level overview of relevant policies is provided at Appendix 4.0.

Kent County Council

6.68 As the minerals and waste planning authority for Kent, KCC plans for waste management capacity and mineral provision across its administrative area. The development plan documents in this regard comprise:

- Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020); and
- Kent Minerals Sites Plan (September 2020).

6.69 KCC also act as the highway authority for the county and is therefore responsible for transport and highway policies of relevance to the Kent Project Site. The relevant plan document in this regard comprise:

- Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031

6.70 As noted above, a high-level overview of relevant policies is provided at Appendix 4.0.

Thurrock Council

6.71 Thurrock Council is a unitary authority, having responsibilities that include highways and minerals and waste planning in addition to district planning functions.

6.72 The current development plan documents are as follows:

- Core Strategy and Policies for Management of Development (January 2015); and
- Thurrock Borough Local Plan (Saved Policies) (September 1997).

6.73 The Policies Map illustrates geographically the relevant policies and sites as set out in the above documents.

6.74 The Core Strategy and Policies for Management of Development document was adopted on 21 December 2011 and updated on 28 January 2015, following an independent examination focussing on its consistency with the NPPF. It includes policies in relation to minerals and waste.

6.75 In February 2014 the Council decided to start work on a new Thurrock Local Plan. This will consolidate work started and subsequently suspended on the Core Strategy Broad Locations and Strategic Sites, the Site Allocations Local Plan and the Minerals and Waste Local Plan for Thurrock.

6.76 As a unitary authority, the Council also function as the highways authority, the relevant policy requirements here comprise:

- Thurrock Transport Strategy 2013-2026 Summary.

6.77 As noted above, a high-level overview of relevant policies is provided at Appendix 4.0.

Local planning policy overview

6.78 Table 6-2 below provides an overview of the various development plan documents across the local authorities.

Table 6-2: Adopted and emerging planning policy

Local Authority	Adopted	Emerging
Dartford Borough Council	• Dartford Development Policies Plan (July 2017) • Dartford Core Strategy (September 2011)	• New Local Plan (Preferred Options) (January 2020)
Gravesham Borough Council	• Gravesham Local Plan Core Strategy (September 2014) • Gravesham Local Plan First Review (Saved Policies) (November 1994)	• Part 1: Local Plan Core Strategy Partial Review and Site Allocations Document (October 2020) • Part 2: Draft Development Management Policies Document (October 2020)
Kent County Council	• Kent Minerals and Waste Local Plan (as amended by	

	Early Partial Review) (September 2020) • Kent Minerals Sites Plan (September 2020) • Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031	
Thurrock Council	• Core Strategy and Policies for Management of Development (January 2015) • Thurrock Borough Local Plan (Saved Policies) (September 1997) • Thurrock Transport Strategy 2013-2026 Summary	• Thurrock Local Plan (Issues and Options)

Whilst a material consideration, the Ebbsfleet Garden City Implementation Framework (2017) does not form part of the statutory development plan and is thus not identified within this table.

Local planning policy references

6.79 Due to similar approaches to policy referencing within the various development plan documents, care should be taken to ensure there is no confusion as to which policy is being referred to. This is particularly the case with policies of the Dartford Core Strategy (September 2011) and the Gravesham Local Plan Core Strategy (September 2014) as both documents use the prefix 'Policy CS' before the policy number is given. For example, Policy CS10: Housing Provision of the Dartford Core Strategy (September 2011) should not be confused with Policy CS10: Physical and Social Infrastructure of the Gravesham Local Plan Core Strategy (September 2014).

6.80 Wherever possible the text seeks to make it clear which policy is being considered, however the reader is advised to frequently refer to Appendix 4.0 and 5.0 to check any references where it may be unclear.

PLANNING GUIDANCE DOCUMENTS

Supplementary Planning Guidance / Supplementary Planning Documents

6.81 Outside of the statutory development plan, a number of other formal and informal documents have been prepared across the various local authorities. While the status of these documents may be different, and thus the weight that may be afforded to them change, in certain instances they may provide helpful indication and elaboration on

policies or comments within the statutory development plan. For example, Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD) give more guidance to support policies and proposals in the adopted development plan documents. While they don't carry the same weight as policies found within a statutory development plan document, they can be taken into account when deciding planning applications under the 1990 Act.

6.82 Key other documents have been identified in Appendix 4.0 but does not attempt to be exhaustive in that regard given the significant range of documents produced across the local authorities.

OTHER DOCUMENTS

Planning Inspectorate Advice Notes

6.83 The Planning Inspectorate (PINS) has published a series of advice notes that are intended to inform applicants, consultees, the public and others about a range of process matters in relation to the 2008 Act.

6.84 While the advice notes are non-statutory they are published to provide advice and information on a range of issues arising throughout the whole life of the application process. The advice notes cover a wide range of topics and all have been considered in the preparation and submission of this application, however, of most relevant to this Statement is considered to be Advice Note 9, as discussed below.

Advice Note 9 – Rochdale envelope v3 (July 2018)

6.85 For practical reasons LRCH wishes to maintain flexibility about the detailed design of elements of the project, including the content of the resort core. At the same time, the developer acknowledges the essential need to provide sufficient information about the project to inform the EIA and the assessment of transboundary effects and the Habitat Regulations Assessment. To these ends, the EIA was undertaken in accordance with what is known as 'Rochdale Envelope' principles.

6.86 These principles are explained in Planning Inspectorate Advice Note Nine: Using the 'Rochdale Envelope' (version 2, April 2012). They arose from three court cases concerning outline planning applications for development requiring EIA. The issue surrounding the application of the Rochdale Envelope is discussed in Chapter 1: *Introduction* of the ES (document reference 6.1.1).

Ebbsfleet Development Corporation

EDC Corporate Plan 2016-2021 (2018/19 Update)

6.87 This document acts as an update to the Corporate Plan published in 2016, a year after the EDC was formed in April 2015. The Corporate Plan covers the 2016-21 Government Spending Review period. The update includes the publication of new performance targets

agreed with the Government following recommendations from the independent Tailored Review of EDC conducted in late 2017.

6.88 The Vision includes, at page 28, recognition that

'…30,000 people will work in a green, modern environment around the International Station, which is becoming a magnet for economic growth and a destination of choice for investment and innovation.'

6.89 It continues, at page 28, to note that

'…Ebbsfleet promotes its identity as a healthy and dynamic place which is seen as a prime destination for recreation and leisure in Kent.'

6.90 The document identifies that EDC will work collaboratively with stakeholders to help secure the vision, with a particular emphasis on character and quality. The document identifies that it will seek to maximise opportunities to develop sites of national and international significance.

6.91 The document identifies four key development areas (Swanscombe Peninsula, Eastern Quarry, Ebbsfleet Central and Northfleet Riverfront) and a series of targets to be achieved by 2021, including housing delivery, a thriving office-based business and innovation centre around Ebbsfleet International Station (Ebbsfleet Central) and 'identifying opportunities to create a significant destination for Kent.'

6.92 The document sets out six delivery themes, including quality homes and neighbourhoods, enterprising economy, connected people and places, healthy environments, a civic community and sustainable city.

EDC Business Plan 2020/21

6.93 This document represents the fifth and final year of the EDC Corporate Plan Period 2016-21, summarising achievements, business plan highlights, resourcing and risk management.

6.94 The document notes that, in October 2019, EDC completed the acquisition of Ebbsfleet Central from Ebbsfleet Investment GP Ltd (EIGP) – a joint venture company comprising Land Securities and Lafarge Cement – representing an area of approximately 125 hectares with the view of delivering over 3,000 homes and a new commercial centre of more than 185,000 sqm. The document notes that a major focus during 2020/21 will be preparing the site, including progressing a new outline planning permission.

6.95 The document recognises the economic challenges being faced by the Covid-19 pandemic and the need to work constructively with partners. Specifically, with regards to the London Resort, the document notes within its Business Plan highlights that EDC

'continued to work with the landowner and developer to realise the potential of Swanscombe Peninsula, ensuring a positive future contribution to the Garden City and wider North Kent economy'.

CONCLUSION

6.96 This section, along with relevant appendices, has sought to provide an overview of the prevailing legislative, planning policy and guidance context relevant to the London Resort and the Project Site. The NSIP process is managed under complex primary and secondary legislation which differs from planning decisions taken under the 1990 Act.

6.97 There is an extensive policy position relevant to the London Resort through national, regional and local levels. This section has identified that, in the absence of a NPS specific to business or commercial NSIPs, other planning policy documents help provide an important recognition towards the delivery of infrastructure, economic growth and employment and the SoS may have regard to them in reaching their decision on the application. Identification of this relevant planning policy will be considered in the planning assessment undertaken in Chapter eight of this Statement.

Chapter Seven ◆ Consultation and engagement

OVERVIEW

7.1 This chapter of the statement provides a high-level overview of the extensive consultation and engagement undertaken in respect of the emerging proposals for the London Resort since its inception. As might be expected for a project that has evolved and been refined over the course of several years, the level of consultation and engagement has been substantial and has resulted in significant changes to the Proposed Development over time. For that reason, the comments provided within this chapter intend to provide an overview only and are not considered exhaustive. The chapter covers both statutory and additional non-statutory engagement undertaken by LRCH as it has developed its proposals for the London Resort.

7.2 The application is, however, accompanied by a *Consultation Report* (document reference 5.1) which should be referred to for full details of the extensive efforts taken with regards to both statutory and non-statutory engagement undertaken by LRCH since 2014. Importantly, the Consultation Report also sets out further details on how regard has been had to the consultation responses received and how this has helped inform the Proposed Development and the changes that have taken place.

7.3 The 2008 Act requires the developer of a NSIP, to undertake Pre-Application Consultation before making an application for a DCO. Section 42 of the 2008 Act sets out details of who must be consulted (a 'duty to consult'), including prescribed persons, local authorities (as set out in Section 43 of the 2008 Act), other statutory bodies, and persons with an interest in the land (PILs) to be developed (as set out in Section 44 of the 2008 Act). Section 47 of the 2008 Act also sets out the provisions for consulting the local community, in accordance with a Statement of Community Consultation (SoCC) prepared under that section, having consulted the relevant local authorities.

7.4 In March 2015, the Department for Communities and Local Government published Guidance on the pre-application process (March 2015) under Section 50 of the 2008 Act. Section 50(3) of the 2008 Act requires LRCH to have regard to this guidance issued by the Government in respect of pre-application consultation duties. The Guidance confirms that

'pre-application consultation is a key requirement for applications for Development consent for major infrastructure projects'

and notes that

'the Secretary of State must have regard to the extent to which this guidance has been considered and followed as appropriate, in deciding whether to accept an application for examination…'

STAGES OF CONSULTATION

7.5 LRCH has undertaken a number of consultation stages since July 2014, a combination of statutory and non-statutory sessions representing an extensive consultation programme spanning over six years. A summary is provided in Table 7-1.

7.6 LRCH has analysed and carefully considered all of the representations received since 2014 with the feedback received from each stage of consultation incorporated into the developing proposals where appropriate. Each consultation stage has involved a thorough review of the comments raised, having regard to them and enabling them to be considered as time goes on. This has enabled key refinements to be made since 2014, creating a much more refined and informed scheme as the various consultation stages progress.

7.7 As could be expected, given the number of stages of consultation that have taken place, and as the masterplanning exercise has matured over time, refinements made to the Proposed Development have typically reduced in scale and extent at each subsequent stage as key issues become addressed.

7.8 How the consultation process has informed the iterative design evolution of the London Resort and how LRCH has had regard to these comments is set out in both the *Consultation Report* (document reference 5.1) and the *Design and Access Statement* (document reference 7.1). They are also referred to, as relevant, within technical chapters of the ES.

Table 7-1: Consultation stages

Stage	Start*	End*	Duration	Activity	Statutory
One	10 July 2014	28 July 2014		Non-statutory consultation with community and stakeholders on methods of consultation	No
Two	3 November 2014	6 December 2014		Non-statutory consultation on emerging proposals	No
Three	24 February 2015	20 March 2015		Non-statutory themed workshops on specific areas of interest	No
Four	27 April 2015	5 June 2015	40 days	Statutory community and stakeholder consultation on proposed application for DCO	Yes
Five	27 July 2020	21 September 2020	57 days	Statutory community and stakeholder consultation on proposed application for DCO	Yes

NB. Activities/workshops were not necessarily held every day between the start and end consultation dates

7.9 A brief summary of each of the five stages of consultation is now provided in the following paragraphs.

Stage 1 Consultation (July 2014)

7.10 The first stage of non-statutory public consultation took place in July 2014, with four public events and a Councillor preview session. This consultation sought to understand the most effective way to engage and consult with local residents, businesses and interested parties. A total of 2,074 people attended this stage of public consultation and 1,133 feedback forms were received.

Stage 2 Consultation (November 2014)

7.11 The second stage of non-statutory public consultation took place in November 2014. This consultation stage was an opportunity to share emerging proposals with local residents, stakeholders and interested parties and seek to their views. A total of 2,190 people attended 12 public consultation events, and 786 feedback forms were received in response to the emerging proposals.

Stage 3 Consultation (February-March 2015)

7.12 The third stage took place over February and March 2015 and consisted of a series of 22 workshops. The topics for the workshop sessions were directly informed by feedback from the earlier stages of consultation. The themes for the workshop were traffic and transport; jobs, careers, education and training; environment and ecology; masterplanning and infrastructure; culture and heritage; and tourism, business and wider regeneration. Invitations were issued to all individuals who attended Stage One and Stage Two of public consultation, resulting in 617 attendees across the 22 workshop sessions.

Stage 4 Consultation (April-June 2015)

7.13 The fourth stage took place over April to June 2015 where LRCH undertook a statutory consultation on their proposals for the London Paramount Entertainment Resort. Ten public consultation events were held over a three-week period in April and May 2015. The events took place in village halls, leisure centres, council offices and shopping centres in the boroughs of Dartford and Gravesham. Approximately 88,257 exhibition invites were mailed to all individuals and businesses living and working in the boroughs of Dartford and Gravesham. An additional 3,183 postal invites and 4,530 email invites were sent to those individuals who attended previous stages of public consultation and provided their contact details or had registered on the London Paramount consultation website. In total 3,425 people attended the statutory stage of public consultation. The response was extremely positive with 83% of respondents indicating their support for the illustrative masterplan.

Stage 5 Consultation (July-September 2020)

7.14 The most recent and fifth stage took place over July to September 2020 where LRCH undertook its second round of statutory consultation on its proposals for the London Resort.

7.15 In light of the COVID-19 pandemic, this stage of consultation adopted a digital-first approach. The SoCC identified when consultation would be undertaken with the local community, who would be consulted, how they would be consulted, and how LRCH would gather feedback and use it to develop and inform the Proposed Development. The SoCC also took into account advice and guidance from the Government and Planning Inspectorate (PINS) in light of the COVID-19 pandemic. The consultation was carried out fully in line with the published SoCC, as required by Section 47(7) of the 2008 Act.

7.16 LRCH's approach to this fifth stage of statutory consultation was to use a wide range of communications methods to consult residents, businesses, prescribed and non-prescribed consultees. A combination of direct mail (letters and emails), media advertising, social media activity and engagement with Local Authorities was used to ensure stakeholders had the opportunity to contribute during the consultation. The local planning authorities were consulted on two drafts of the SoCC prior to publication given the importance of gaining their input and also to ensure that the digital-first strategy was agreed.

7.17 The statutory consultation period itself was extensive and lasted from 27 July to 21 September 2020, a period of 57 days, far in excess of the 28 days required. The *Consultation Report* (document reference 5.1) provides further details.

7.18 Consultation responses were encouraged by either completing the Feedback Form available on the consultation website, responding by post to a freepost address, providing comments during some 30 webinars or emailing responses. In total, over 1,200 consultation responses were received.

7.19 Further details on specific consultation measures for key groups are outlined in the following sections. In all cases, the *Consultation Report* (document reference 5.1) provides further and definitive details of the extent of engagement undertaken in compliance, and in many cases exceedance of, the requirements under the 2008 Act.

LOCAL AUTHORITIES

Overview

7.20 Section 42 of the 2008 Act and Regulation 3 of and Schedule 1 to the 2009 Regulations set out who LRCH must consult regarding its proposed application. This includes host and neighbouring local authorities. Both during and outside of the statutory and non-statutory consultation exercises undertaken by LRCH, there has been engagement with various local authorities.

7.21 Table 7-2 demonstrates which authorities were considered 'host' authorities, 'neighbouring' authorities and local parish and town councils to the Proposed Development during the 2015 statutory consultation and the 2020 statutory consultation.

Table 7-2: Identification of host authorities, neighbouring authorities and local parish and town councils during 2015 and 2020 statutory consultations

	2015	2020
Host authorities		
Dartford Borough Council	Y	Y
Ebbsfleet Development Corporation	N	Y
Gravesham Borough Council	Y	Y
Kent County Council	Y	Y
Thurrock Council	N	Y
Neighbouring authorities		
Basildon Council	N	Y
Brentwood Borough Council	N	Y
Castle Point Borough Council	N	Y
East Sussex County Council	Y	Y
Essex County Council	Y	Y
Greater London Authority	Y	Y
London Borough of Bexley	Y	Y
London Borough of Bromley	Y	Y
London Borough of Havering	N	Y
Medway Council	Y	Y
Sevenoaks District Council	Y	Y
Surrey County Council	Y	Y
Thurrock Council	Y	N
Tonbridge and Malling Borough Council	Y	Y
Local Parish and Town Councils		
Bean Parish Council	Y	Y
Cobham Parish Council	Y	Y
Darenth Parish Council	Y	Y
Higham Parish Council	Y	Y
Longfield and New Barn Parish Council	Y	Y
Luddesdown Parish Council	Y	Y
Meopham Parish Council	Y	Y
Shorne Parish Council	Y	Y
Southfleet Parish Council	Y	Y
Stone Parish Council	Y	Y
Sutton-At-Hone and Hawley Parish Council	Y	Y
Swanscombe and Greenhithe Town Council	Y	Y
Vigo Parish Council	Y	Y
Wilmington Parish Council	Y	Y

Host authorities

7.22 Due to the unique location of the London Resort and the administrative boundaries in the location, the London Resort falls within the administrative areas of a number of local authorities. For example, the western side of the Swanscombe Peninsula falls within the jurisdiction of DBC, while the eastern side falls within the jurisdiction of GBC. The administrative boundaries are clearly identified within all the accompanying *Land Plans* (document reference 2.2). At a county level, both DBC and GBC fall within Kent County Council and so KCC is also identified as a 'host' authority.

7.23 Following the establishment of Ebbsfleet Development Corporation (EDC) in April 2015, engagement has also been undertaken with the EDC. Moreover, due to the review of the Order Limits, land north of the River Thames was formally included within the Order Limits resulting in Thurrock Council becoming a host authority from 2020.

7.24 Briefing sessions were offered for members of host local authorities of DBC, GBC, KCC and TC. These were set up through liaison with authority officials. Each authority issued invitations to their members and each authority used the online meeting platform of their choice. The presentation slide packs were the broadly the same as those used for the public webinars, with some additional information specific to authorities – including the role of authorities in the DCO process. The same slide pack was used for each authority. Separately, and prior to statutory consultation commencing, an online briefing with EDC Board members took place on 15 July 2020.

7.25 A high-level overview of engagement with the host authorities is discussed in the following paragraphs.

Dartford Borough Council

7.26 As a host local authority, and one of the local authorities with the largest land area within their administrative boundary, there has been engagement with DBC over many years, including meetings and group workshops on topics such as masterplanning, transport, socio-economics, ground conditions, and noise and air quality. Prior to the submission, an online briefing session was held with DBC on 26 August 2020.

7.27 DBC Officers have been actively involved in the dialogue on the London Resort scheme since 2014, which has included a formal process via a Planning Performance Agreement (signed 2016) and via discussions on revised paid-for service in 2020.

Gravesham Borough Council

7.28 As with DBC, GBC is a host local authority, and as such there has been engagement over many years, including meetings and group workshops on topics such as masterplanning, transport, socio-economics, ground conditions, and noise and air quality. Prior to the submission, an online briefing session was held with GBC on 12 August 2020.

7.29 GBC Officers have been actively involved in the dialogue on the London Resort scheme since 2014, which has included a formal process via a Planning Performance Agreement (agreed 2016) and via discussions on revised paid-for service in 2020.

Ebbsfleet Development Corporation

7.30 As a host local authority, and one of the authorities with the largest land area within their administrative boundary, there has been engagement with EDC over many years, including meetings and group workshops on topics such as masterplanning, transport and socio-economics. Prior to the submission, an online briefing session was held with EDC on 15 July 2020.

Kent County Council

7.31 As a host local authority, and the highways and minerals and waste authority across the Kent Project Site, there has been engagement with KCC over the years, including meetings and group workshops on topics such as, transport, environment and socio-economics. Other discussions and engagement have been held with regards to regeneration, waste, landscape, ecology and heritage. Prior to the submission, an online briefing session was held with KCC on16 September 2020.

Thurrock Council

7.32 While Thurrock Council was a neighbouring authority during the 2015 statutory consultation, revisions to the Order Limits to include land north of the River Thames in 2020 resulted in Thurrock Council becoming a host authority. Engagement with Thurrock Council therefore increased significantly from 2020. There has been positive engagement on matters including transport and socio-economics. Prior to the submission, an online briefing session was held with Thurrock Council on 15 September 2020.

Neighbouring authorities

7.33 A number of neighbouring authorities were identified as consultees, as given in Table 7-2.

7.34 Prior to the submission, and on request, an online briefing session was held with Medway Council on 3 August 2020.

Local Parish and Town Councils

7.35 A number of Local Parish and Town Councils were identified as consultees, as given in Table 7-2. Briefings sessions were offered to the Town and Parish Council's closest to the Project Site. Online briefing sessions prior to the submission were subsequently held with Swanscombe and Greenhithe Town Council on 26 August 2020 and Bean Parish Council (and Bean Residents Association) on 27 August 2020.

PERSONS WITH AN INTEREST IN LAND

7.36 Section 42 of the 2008 Act instils a duty to consult each person who is within one or more of the categories set out in Section 44 of the 2008 Act, being Persons with an Interest in Land (PILs). The *Consultation Report* (document reference 5.1) and *Statement of Reasons* (document reference 4.1) detail measures taken to establish the identity of PILs, including LRCH instructing LRS to conduct the land referencing exercise.

7.37 Information requests were issued to all identified titles to determine rights over land. This provides an understanding of whether the recipient is an owner, lessee, tenant or occupier of the land as stated under Category 1 of Section 44 of the 2008 Act or has the legal power to sell and convey the land under Category 2 of Section 44.

7.38 PILs were sent letters detailing the consultation material available along with a hard copy of the Order Limits. Additional parties were subsequently identified and consultation packs were issued to these recipients at later dates. All consultees were notified of the deadline for response and given a minimum of 28 days from the day after the day of receipt to provide feedback on the proposals.

STATUTORY BODIES

7.39 Section 42 of the 2008 Act and Regulation 3 of and Schedule 1 to the 2009 Regulations sets out a prescribed list of bodies who must be consulted.

7.40 Given the nature of the London Resort and the issues raised, LRCH and its consultant team has been engaged with a considerable number of these statutory bodies relevant to the Proposed Development over the course of many years both during consultation stages but, just as importantly, over the course of time during the progression of the Proposed Development. In many cases, the same professionals have been acting on both sides generating a wealth of experience and understanding of the key issues affecting the Project Site. Although not exhaustive, engagement has been had with the organisations provided in Table 7-3. The level of nature and level of engagement has varied but is identified within the corresponding technical documents forming part of the application.

7.41 While statutory bodies were consulted during the various formal stages of consultation (including in accordance with the requirements for statutory consultation under Stages 4 and 5), correspondence, engagement and meetings with statutory bodies on technical matters has continued from the Stage 4 consultation up to, including and beyond Stage 5 consultation. Details of meetings and correspondence are included in the relevant technical Chapters of the ES. In many cases, formal agreements under the pre-application advice services have been entered into, for example, but not limited to, the Environment Agency, Natural England, the Marine Management Organisation and Historic England. This process has facilitated the effective engagement on specialist matters between LRCH's consultants and statutory bodies, helping to respond to queries and refine the Proposed Development and mitigation strategies ahead of the submission of the DCO.

These relationships will also be used to develop Statements of Common Ground (SoCG) during the course of the examination.

Table 7-3: List of key statutory bodies engaged with LRCH

Organisation	Main topics
Civil Aviation Authority	Transport
Environment Agency	Flood risk Ground conditions Masterplanning
High Speed 1	Transport Masterplanning
Highways England (formerly Highways Agency)	Transport
Historic England (formerly English Heritage)	Heritage
Marine Management Organisation	Transport Ecology
Network Rail	Transport
Port of London Authority	Transport Masterplanning
Natural England	Ecology Masterplanning Landscape
Planning Inspectorate	DCO matters
Department for Transport	Transport
National Grid (electricity) plc	Utilities
National Grid (gas) plc	Utilities
Thames Water	Utilities
Southern Water	Utilities
UK Power Networks Ltd	Utilities
N Power Limited	Utilities
SSE Pipelines Ltd	Utilities
British Gas Services Ltd	Utilities
British Telecommunications plc	Utilities
Essex and Suffolk Water	Utilities
Anglian Water	Utilities
Thames Clippers	Transport
Port of Tilbury London Limited	Transport Masterplanning
TfL	Transport
Kent Fire & Rescue Authority	Transport Masterplanning
Health & Safety Executive	Masterplanning
Kent Police	Security
Essex Police	Security

LOCAL COMMUNITY

7.42 Section 47 of the 2008 Act identifies a duty to consult the local community. Guidance on how developers should consult on their NSIP projects, 'community' means those who live or work in the vicinity of the project, including visitors and users of the area. LRCH also consulted community and interest groups, businesses, visitors, as well as prescribed landowners, statutory bodies and the wider public.

7.43 As detailed within the *Consultation Report* (document reference 5.1), LRCH sought to engage with local authorities on the emerging SoCC which would set out the details for how the community would be consulted. Although not a statutory requirement, an early development of the draft SoCC was sent to DBC, GBC and EDC in April 2020, with feedback received from GBC and EDC. LRCH subsequently formally consulted DBC, GBC, KCC, TC and EDC on the draft SoCC, in accordance with the requirements of Section 47 of the 2008 Act, seeking their comments on what would be the best way to consult with the community. During the formal 28-day consultation period on the draft SoCC responses were received from GBC, DBC, KCC and EDC. TC responded during the consultation period requesting an extension, which LRCH accepted, with TC subsequently responding.

7.44 A summary of key points raised and an explanation of how LRCH took these into account is provided in the *Consultation Report* (document reference 5.1). Details are also provided with regards to the necessary statutory notices and publication of the SoCC.

7.45 On 22 July 2020, the Infrastructure Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020 (the 2020 Regulations) came into force introducing temporary changes to certain publicity requirements along with MHCLG Guidance on implications of the COVID-19 pandemic to certain consultation and publicity requirements of the NSIP regime. LRCH took great care to ensure the guidance was followed diligently, while maximising the reach of the statutory consultation exercise.

7.46 The following sections provide a brief overview of public consultation measures undertaken. These are:

- Public consultation webinars;
- Mailout;
- Press;
- Project website;
- Virtual exhibition;
- Email;
- Social media;
- Freephone; and

- Telephone surgeries.

Public consultation webinars

7.47 During the statutory consultation period, due to the COVID-19 pandemic, restrictions remained in place relating to large public indoor gatherings and many libraries and civic centres remained closed meaning that hard copy documents were not available for inspection. The primary channel for consultation activity was therefore digital.

7.48 LRCH hosted 20 public webinars between the period 4 August and 5 September 2020 using the Livestorm platform. Livestorm is an 'in-browser' platform meaning that attendees are not required to download an app or desktop programme to attend a webinar, helping accessibility. The webinars took place during lunchtimes and evenings on selected weekdays, and at lunchtimes on weekends during the consultation period. Dates, times and attendance figures are provided within the *Consultation Report* (document reference 5.1).

7.49 Public webinars were open to anyone interested in attending subject to registering in advance for given dates and times, via links published on the consultation platform. Attendees could register for as many events as they wanted.

7.50 At each of the public webinars members of the Project team provided an overview of the proposals and engaged in a Q&A session. Questions from attendees which were submitted via the webinar platform question function were answered verbally. All webinars were recorded, with an example recording made available on the Project website for those who could not attend one of the live sessions. A version of the webinar recording with subtitles and a British Sign Language interpreter was also available on the website.

Mailout

7.51 LRCH posted a consultation information leaflet to all residential, community and business properties within the Core Consultation Zone in Dartford, Gravesham and Thurrock, amounting to 105,000 leaflets. The leaflet provided an overview of the Project and the consultation, with details about where more information could be obtained and the various ways to respond to the consultation.

Press

7.52 Press releases were issued to local, national and industry media publications weeks before consultation started and at the start of the consultation. The consultation received widespread coverage in print, online, TV and radio, locally, nationally and internationally (given the nature and level of interest in a global style facility). Adverts were also placed on local news websites in Kent and Essex. A summary of the media report is provided as an appendix to the *Consultation Report* (document reference 5.1).

Project website

7.53 The London Resort website contained information about the consultation and provided a link to a dedicated consultation platform and to the virtual consultation exhibition space.

7.54 The consultation platform provided an overview of the consultation, contact details for those who wished to contact the Project team and details about how to provide feedback on proposals. All consultation materials were available via this platform along with the online response form. Dates, times and registration links were also provided for all public consultation webinars. A summary of the digital report is provided as an appendix to the *Consultation Report* (document reference 5.1).

Virtual exhibition

7.55 A virtual exhibition room was designed to be similar to what would be available during an in-person event, had they been possible without the COVID-19 pandemic. The virtual exhibition enabled visitors to look around the materials from a computer or mobile device, explaining the Proposed Development in an accessible, interactive and engaging way.

Email

7.56 An email contact address was operated throughout the consultation period, to assist people who needed more information on the consultation and for those who wished to order hard copies of materials.

Social media

7.57 The dedicated London Resort social media channels (Twitter and Facebook) were regularly updated with new posts to make people aware of the public consultation events, how to access consultation documents, as well as information on how to provide feedback on the proposals and the deadline for comments.

Freephone

7.58 A freephone line was made available for people to get in touch with the London Resort team with any queries. It was manned during normal office hours Monday to Friday and Saturday 11am – 2pm. Out of hours a voicemail service was provided.

Telephone surgeries

7.59 For those who were not comfortable or not able to access information digitally, or who required a more detailed discussion, members of the public could arrange a telephone surgery to talk to one of the Project team in more detail. These could be booked via the freephone line or email using the contact details provided. These were promoted on the website and in the consultation materials and were offered in responses to telephone and email enquiries.

OTHER ENGAGEMENT EFFORTS

7.60 From the outset, LRCH has been keen to ensure wide-spread engagement with its proposals. Its engagement efforts have extended far beyond statutory requirements. Some of the additional aspects of engagement are identified in the following paragraphs.

Community Liaison Group

7.61 LRCH established the London Resort Community Liaison Group (CLG) in 2016 and reconvened in June 2020. Membership comprises of around 20 local representatives and community groups, to provide a forum for discussion, information provision and feedback. The CLG includes local political representatives but also other important local organisations and groups.

7.62 The CLG has met virtually three times since being reconvened.

7.63 The first meeting took place on 25 June 2020 to agree Terms of Reference for the group, review membership, provide a progress update about the Project and to discuss the approach for the planned statutory consultation.

7.64 The second meeting was a consultation briefing webinar, which took place with the CLG on 8 September 2020. This followed a similar format and content to the public webinars, with LRCH and Project team attendees presenting proposals and taking questions from attendees.

7.65 The third meeting took place on 4 November 2020, to provide an overview of consultation responses, and to present and seek feedback on LRCH's Employment and Skills Agenda. Further meetings are being planned for 2021, which are expected to follow topic-based themes.

Accessibility and inclusivity

7.66 LRCH hosted a webinar on 8 September 2020 which focused on the topic of Accessibility and Inclusivity. The webinar included British Sign Language interpreters and live subtitling. This followed a similar format to consultation public webinars, with members of the project team presenting proposals, followed by a dedicated topic specific presentation and discussion.

Land acquisition, property compensation and the London Resort premium

7.67 LRCH hosted topic specific webinars intended for anyone who considered that they may be entitled to compensation in the event that the DCO is granted. Two webinars took place on 9 September 2020 during the consultation period, with an additional two webinars held on 21 October 2020, outside of the consultation period.

7.68 These webinars were attended by representatives of LRCH and its property and legal advisers. The first two webinars, held during the consultation period, were also attended by masterplan and transport specialists.

7.69 Further detail is provided within the *Consultation Report* (document reference 5.1).

PROPOSED DEVELOPMENT REFINEMENT

7.70 All representations received during the non-statutory and statutory pre-application consultation stages over the years have been considered by LRCH and taken into account in the development and refinement of the Proposed Development. LRCH has taken great care to analyse and have regard to these comments, giving consideration to all feedback received.

7.71 How the consultation process has informed the iterative design evolution of the London Resort is set out in greater detail both within the *Consultation Report* (document reference 5.1) and the *Design and Access Statement* (document reference 7.1). They are also referred to, as relevant, within chapters of the ES.

7.72 While not exhaustive, some of the key influences and changes that have been made to the Proposed Development, in direct response to the feedback received during consultation include:

- A comprehensive, multi-modal sustainable transport strategy designed to keep London Resort traffic off local roads and minimise impacts on the Strategic Road Network. The transport strategy includes:
  - Maximising opportunities for the use of river, rail and bus, and access routes for pedestrians and cyclists;
  - A 'Park and Glide' facility within the Port of Tilbury to provide access to the London Resort from north of the River Thames; and
  - Developed our plans for a new London Resort Access Road and improvement works to the A2, with a revised junction layout, to keep local and London Resort traffic separate.
- Enhancement of Pilgrims Way;
- An enhanced network of pedestrian and cycle routes to improve connectivity within existing neighbourhoods, and creation of linkages with the network of green spaces and improved access to the riverside;
- Changes to the Illustrative Masterplan layout have been designed to improve and enhance the structure of the landscape and ensure that important habitats and green space are retained and enhanced, with protected areas for species to enhance biodiversity and ecology, as well as quiet zones for visitors and local communities to relax in natural surroundings;
- Increased emphasis on applying sustainability principles and operationally net zero carbon across our design, development and operation of the London Resort;

- Revised scheme content, with changes to the proposed entertainment and amenities on offer both inside and outside the park gates to ensure that a more diverse range of amenities is accessible to local communities and businesses outside the 'payline' of the theme parks;

- Revision of the Order Limits, reducing impacts on local communities and residential properties. This is as a result of the Highways England A2 Bean and Ebbsfleet Junction improvement works, which means significant improvements will not be required to Bean Junction, resulting in:

  - Revisions to the requirements for our access corridor from the A2 to the London Resort; and

  - Removal the need for land south of the Ebbsfleet Junction;

- Accommodation provision for staff working at the London Resort, including seasonal employees, was introduced following changes to the NSIP Regulations in April 2017 and an identified functional need. This was included as part of the proposals to further reduce pressure on a requirement for staff to travel to the Project Site and to reduce impacts on the local housing markets.

7.73 The above demonstrates how LRCH has had regard to the consultation feedback as a result of the non-statutory and statutory consultation exercises undertaken since 2014. Further details are provided within the *Consultation Report* (document reference 5.1).

CONCLUSION

7.74 LRCH has been committed to thorough and meaningful consultation and engagement since its inception. LRCH has adopted an extensive five-staged approach to consultation with three non-statutory phases (2014, 2014 and 2015) and two statutory phases (2015 and 2020) being undertaken in accordance with the requirements of the consulted-upon and published Statement of Community Consultations (SoCC), the 2008 Act and all other statutory requirements (including those reflecting the COVID-19 pandemic) and guidance.

7.75 The two statutory consultation exercises in 2015 and 2020 generated in excess of 765 and 1,200 responses respectively. This volume of responses coupled with the levels of engagement with the earlier three stages of non-statutory consultation and volume of attendees at events throughout all stages of consultation is clear evidence of well-publicised and substantial engagement.

7.76 The *Consultation Report* (document reference 5.1) identifies that the significant increase in volume of responses to the 2020 statutory consultation, compared with the 2015 statutory consultation, coupled with the level of detail raised within the responses (as set out in the document), is clear evidence that the digital-first approach was well-publicised, accessible and contained a sufficient amount of information for informed points to be made.

7.77 Regard has been had to consultation responses received during both statutory and non-statutory pre-application consultation stages, including some which have influenced the Proposed Development and submission details. Further details are set out within the *Consultation Report* (document reference 5.1).

Chapter Eight ◆ Planning assessment

OVERVIEW

8.1 Having described the Project Site, outlined the Proposed Development (including an identification of Principal Development and Associated Development), and presented the relevant national, regional, and local planning policy, this chapter will assess the proposals as per the identified key issues and matters pertinent to this application.

ENVIRONMENTAL IMPACT ASSESSMENT

8.2 Environmental impact assessment (EIA) is a process that aims to improve the environmental design of a development proposal and provide decision-makers with sufficient information about the likely significant environmental effects of implementing and operating a project.

8.3 The results of the EIA process are set out in an Environmental Statement (ES). Where required, an ES is normally submitted with an application for planning permission or development consent, and provides environmental information about the scheme, including a description of the development, its predicted environmental impacts and the measures proposed to eliminate or reduce any significant adverse effects.

8.4 For projects requiring development consent under the Planning Act 2008 and for which EIA is required, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 Regulations) are applicable. These regulations set out the procedural requirements for undertaking an EIA.

8.5 The London Resort does constitute EIA development. Accordingly, the Application is accompanied by an ES. Further details on the EIA Scoping exercise are set out within Chapter 1: *Introduction* of the ES (document reference 6.1.1).

IDENTIFICATION OF KEY ISSUES

8.6 Guided by the EIA, which is considered a comprehensive basis of key issues which has been the subject of various rounds of EIA Scoping and statutory consultation, the key considerations in respect of this application are considered to be:

- Principle of development;
- Market opportunity;
- Regeneration and economic dividend;

- Employment;
- Related housing;
- Retail and leisure impact;
- Masterplanning;
- Cultural heritage and archaeology;
- Sustainability and energy;
- Utilities;
- Transport;
- Air quality;
- Lighting
- Ecology;
- Landscape and visual effects;
- Arboriculture;
- Noise and vibration;
- Operational waste;
- Amenity;
- Health;
- Flood risk;
- Ground conditions; and
- Construction.

8.7 Taking each of the above key issues in turn, each section, where necessary provides a high-level overview of the prevailing national and local planning policy context. Key planning policies are identified in figures where appropriate but do not necessarily seek to be exhaustive given the broad and extensive policy basis identified in Chapter 6 and set out within Appendices 3.0, 4.0 and 5.0 to this Statement. An assessment as to the key issues is provided including a summary of technical reports and assessments where necessary and relevant. Then, the assessment considers the compliance of the proposals with the relevant development plan policies and then identifies any other material considerations,

as relevant to each of the matters, including compliance with the policies and guidance contained in NPS where relevant and the NPPF.

PRINCIPLE OF DEVELOPMENT

Overview

8.8 Before considering detailed planning considerations and key issues associated with the Proposed Development, it is important to establish the acceptance of the principle of development at both national and local levels.

Figure 8-1: Key planning policy relating to the principle of development

National Planning Policy Framework (February 2019)
- Chapter 2: Achieving sustainable development
- Chapter 6: Building a strong, competitive economy

Dartford Core Strategy (September 2011)
- Policy CS6: Thames Waterfront
- Policy CS8: Economic Change

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- Policy CS06: Ebbsfleet (Gravesham) Opportunity Area

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSSP2: Sustainable Employment Growth
- Policy CSTP28: River Thames

Ebbsfleet Implementation Framework (2017)
- Pages 124-129

National

8.9 As noted in Chapter six of this Statement, most forms of Nationally Significant Infrastructure Projects (NSIP) benefit from National Policy Statements (NPS) produced by Government. The NPS set out the Government's objectives for the development of nationally significant infrastructure in a particular sector and state, often identifying need and 'in principle' acceptance of critical infrastructure, such as energy (power stations etc.), transport (road, rail and air infrastructure etc.) and waste (waste water, hazardous waste etc.). There are, however, no NPSs for business or commercial projects – either published or in draft form and no indication that one will be forthcoming. This section therefore seeks to clarify the acceptability of the principle of development in this location, helping

shape the context in which the Proposed Development should be considered against the detailed planning considerations discussed in subsequent sections of this chapter in line with the presumption in favour of sustainable development.

8.10 At a national level, in the absence of an NPS, planning policy is derived from the NPPF. As noted in Chapter 6 of this Statement, the NPPF is capable of being a key material consideration for the SoS in their decision-making process. Paragraph 80 of the NPPF notes that:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'

8.11 Moreover, Paragraph 82 of the NPPF indicates that planning policies and decisions should recognise and address the specific locational requirements of different sectors. In this regard, the development of a global entertainment resort has clear and specific locational requirements that differ from other forms of development which may be more flexible and adaptable in their location and form (for example, housing, industrial or offices). This fact is also pertinent in considering the locational assessment of the Proposed Development under retail and leisure uses (which are unique) discussed in subsequent sections of this chapter.

8.12 The London Resort was subject to a detailed site selection and alternatives process, as explained in Chapter three of this Statement and in further detail through Chapter 4: *Project Development and Alternatives* of the ES (document reference 6.1.4). This comprehensive site selection process involved assessing multiple sites against a number of required and robust criteria relevant to the development of a global entertainment resort. A number of potential sites were considered within proximity to London, however the Project Site offered considerable advantages against the selection criteria than any of the other reasonable alternatives. The Proposed Development is therefore considered to accord to Paragraph 82 of the NPPF, reflecting specific locational and land availability requirements of a global entertainment resort.

8.13 Since the announcement of the London Resort (or London Paramount Entertainment Resort) there has been no reference of any alternative location nor indeed any other similar scheme emerge, recognising the very significant commercial opportunity (as explained in other documents, including the *Economic and Regeneration Statement* (document reference 7.5).

Local

8.14 The Project Site's unique location spanning a number of host authorities has previously been identified in Chapters two and seven of this Statement. As a result, it has been necessary to consider how, at a local level, the Project Site is identified and approached within the various existing adopted and, where relevant, emerging development plan documents. The development plan documents have undergone extensive plan

preparation stages, including independent examination and the necessary sustainability and environmental assessments, to ensure they are sound.

Dartford Borough Council

8.15 The majority of the Swanscombe Peninsula itself falls within the administrative area of Dartford (central and west of the Peninsula), with a lesser extent in the administrative area of Gravesham (east of the Peninsula). This is demonstrated within the *Land Plans* (document reference 2.2).

8.16 Policy CS6: Thames Waterfront of the Dartford Core Strategy (September 2011) identifies explicit support for the delivery of employment opportunities across the Swanscombe Peninsula. Diagram 7, which relates to and aides the interpretation of Policy CS6, identifies the part of Swanscombe Peninsula falling within DBC's administrative boundary as a 'Key Development Site'. In particular, at part h), the policy notes

'h) Supporting leisure uses at Swanscombe Peninsula where these are of an outdoor nature, or set in generous greenspace subject to compatibility with adjoining uses and impact on town centres. Proposals which maximise the tourism potential of Ebbsfleet and provide fast and convenient public transport links to Ebbsfleet station as part of the scheme will be particularly encouraged.'

8.17 Although not explicitly referenced, given the relative infancy of the London Resort at the time the Dartford Core Strategy was prepared and adopted, it is no coincidence the London Resort closely aligns to the high level description provided within part h) of this policy. The London Resort is considered closely aligned to the principles of this policy for the following reasons:

- The London Resort is a leisure use that seeks to be recognised and competitive at a global scale and is set amongst generous areas of previously developed land that will undergo significant enhancement and improvement (see *Landscape Strategy* (document reference 6.2.11.7)) and not in conflict with any other proposed land use such as housing (which could not be delivered given the extent of contamination and other environmental challenges);

- Owing to its ambition to be of national and global significance, delivering the first truly global entertainment resort within the UK, the London Resort is considered to wholeheartedly fulfil the prospects of maximising the tourism potential, both with domestic and international tourists, as indicated by the policy. This is a topic discussed further in subsequent sections of this chapter but at maturity in 2038 the London Resort is expected to attract over 12.5 million visitors a year; and

- In addition, the London Resort, through its well-considered transport strategy, will look to optimise the benefits of being located in proximity to Ebbsfleet International Station, as will also be discussed in subsequent sections of this Statement. This aspect of the London Resort therefore also closely aligns to the policy requirements of maximising links to Ebbsfleet International Station.

8.18 The principle of the delivery of the London Resort upon the Swanscombe Peninsula is therefore considered to be in compliance with the thrust of Policy CS6 and specifically part h) which relates to site specific matters.

8.19 Policy CS8: Economic Change identifies the focus for growth in specified sectors, with specific proposals listed in the policy including the exploration of an 'Environmental Technology Park' on the Swanscombe Peninsula.

8.20 Whilst on the surface the London Resort is an entertainment and leisure facility its cutting-edge and global ambition means it is underpinned by technology and the vision of LRCH to deliver a carbon-neutral in operation scheme both demonstrate why this limb of policy is compatible. Policy CS8, part e) identifies a focus on growth sectors which are noted to include creative industries, hospitality and leisure and part f) built environment and construction. Both directly and indirectly, the delivery of the London Resort, as a global entertainment resort, is considered to align to these aspirations for growth in these sectors. The *Outline Employment and Skills Strategy* (document reference 6.2.7.7) identifies the variety of sectors and employment opportunities that could be expected to complement the London Resort through wider businesses within the supply chain, which may include, for example, local businesses within the creative industry (entertainers, artists, performers, actors, designers, musicians etc.) and general supply chain and operational matters (florists, hoteliers, security firms, catering etc.) in accordance with part e). In accordance with part f), the construction of the London Resort will generate significant employment opportunities for a number of years, providing an important basis for training and skill development in the field. The *Outline Employment and Skills Strategy* (document reference 6.2.7.7) further discusses construction workforce.

8.21 The London Resort is therefore considered to accord to the thrust of Policy CS8 in providing a significant development that helps deliver economic change through sectors identified within the policy. Moreover, the London Resort will indirectly support a considerable number of other sectors on a local, regional and national basis as will be discussed in subsequent sections of this chapter.

8.22 With regard to emerging development plan documents, DBC's New Local Plan (Preferred Options) (January 2020) is more explicit in referencing the proposals for the London Resort given the maturity of its proposals. It should be noted that the New Local Plan had emerged during late 2018 and during 2019 when progress of the London Resort was largely paused to allow a review of the scheme, and in particular the direction provided by PY Gerbeau. While also considering alternative uses for the Swanscombe Peninsula, l leaflet used to support the consultation[7] notes

'The creation of a resort at Swanscombe Peninsula would have many advantages, particularly for jobs, skills and local leisure provision, but we must ensure that the local transport infrastructure is protected and that any proposal benefits the wider community.'

[7] https://www.dartford.gov.uk/__data/assets/pdf_file/0008/896228/Hand-outs-combined.pdf [Accessed 24 Jul 2020]

8.23 The delivery of the London Resort upon the Swanscombe Peninsula therefore continues to be in accordance with the thrust of this emerging policy, subject to assessment of the other detailed planning considerations to which it refers.

8.24 It is therefore evident that within both existing and emerging Dartford development plan documents, the principle of the delivery of a leisure use, set in generous greenspace with strong connections to Ebbsfleet International Station is to be actively supported.

Gravesham Borough Council

8.25 As noted previously, the eastern part of the Swanscombe Peninsula falls within Gravesham. This is demonstrated within the *Land Plans* (document reference 2.2).

8.26 Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area of the Gravesham Local Plan Core Strategy (September 2014) identifies the potential opportunities arising for the Opportunity Area and sets out requirements for future development proposals. The policy recognises the Swanscombe Peninsula, in a general sense, as a substantial opportunity for major riverside regeneration where it can bring significant benefits to existing adjoining residential communities and the Borough as a whole. Much of Gravesham's administrative area concentrates on the eastern of the Swanscombe Peninsula and areas of Northfleet which are identified for residential-led redevelopment. For this reason, there is not extensive references to the redevelopment of the 'core' of the Swanscombe Peninsula where the London Resort is to be positioned. The policy does, however, indicate a targeting of *'…new housing and jobs whilst achieving environmental improvement…'* As noted later in this chapter, the Proposed Development will deliver significant employment opportunities while ensuring the Proposed Development is sensitive to the environmental conditions across the Swanscombe Peninsula (and beyond) that affect natural and human habitats. The delivery of the London Resort would therefore support this objective.

8.27 Paragraph 4.3.4 of the Gravesham Local Plan Core Strategy (September 2014) provides explicit reference to

'…recognising the development potential of Swanscombe Peninsula and Ebbsfleet which will carry the regeneration process beyond the plan period and beyond the boundaries of Gravesham as part of a longer term, sub-regional vision.'

8.28 Moreover, paragraphs 4.4.3 and 4.4.4 identify the constraints to development of Swanscombe Peninsula and note that development will require a comprehensive masterplan approach with the presumption that development will likely comprise industrial/commercial uses together with greenspace.

8.29 While the majority of Policy CS03 seeks to ensure the delivery of residential-led regeneration of specified sites across Northfleet, there is recognition towards the principle of the redevelopment of the parts of Swanscombe Peninsula within GBC's administrative boundary. The supporting text to the policy suggests the constraints will likely see the delivery of industrial/commercial uses and not residential land uses.

8.30 Policy CS06: Ebbsfleet (Gravesham) Opportunity Area relates the areas of land within GBC's administrative boundaries to the east of Ebbsfleet International Station. It recognises that the Opportunity Area offers substantial potential for a high quality, sustainable, mixed use development in line with the long-standing strategy to create a major business district at Ebbsfleet (covering both areas within Dartford and Gravesham). LRCH has long recognised the ambitions of DBC, GBC and (more recently) the EDC for the significant regeneration of the Ebbsfleet Central area, focussed around Ebbsfleet International Station. Discussions on such have been ongoing for a number of years with a number of stakeholders involved in this aspect of the Proposed Development, not least HS1 and relevant landowners. The London Resort seeks to provide its designated London Resort Access Road north from the A2(T) through to the Swanscombe Peninsula, running alongside the HS1 line and passing through Ebbsfleet Central. Detailed discussions are ongoing with relevant parties in respect of masterplanning approaches for Ebbsfleet Central which includes the proposed works by LRCH in and around the station, and the London Resort Access Road. Further details on this assessment are provided within later sections of this chapter. In this regard, the London Resort is considered to complement and be compatible with Policy CS06.

8.31 At the time of writing, GBC is consulting on a Partial Review of the Gravesham Local Plan Core Strategy and proposing detailed Development Management Policies, with consultation ending on 31 December 2020. Appendix 3 to the consultation document identifies that Policy CS03 and Policy CS06 both require no modifications. GBC is therefore, in effect, seeking to confirm the proposals for the London Resort within its latest development plan documents, providing a clear indication on the direction of travel and in principle support for the emergence of a global entertainment resort upon the Swanscombe Peninsula.

8.32 The principle of the development of the London Resort upon the Swanscombe Peninsula is therefore considered to be in accordance with the thrust of policies within existing and emerging Gravesham development plan documents.

Ebbsfleet Development Corporation

8.33 As noted in Chapter six of this Statement, EDC does not hold statutory development plan making powers. However, as the LPA for its area until wound up, it has published the EDC Implementation Framework (EIF) (2017), which it uses and applies, alongside the development plan documents adopted by DBC and GBC, as a material consideration to determine planning applications determined under the Town and Country Planning Act 1990 and to guide the delivery of its vision across the Ebbsfleet Garden City. The EIF is considered a relevant material consideration in the assessment of planning applications assessed and determined within its administrative area. Likewise, it also falls to be recognised as a material consideration in the determination of the DCO application for the London Resort.

8.34 Of note is the EIF's identification and recognition of the general footprint of the proposed London Resort north of the North Kent railway as *'land subject to [the] London Entertainment Resort NSIP process'* (page 83). Moreover, the EIF also identifies a

transport connection between the A2(T) and the core of the Project Site on the Swanscombe Peninsula, running generally along the western side of the HS1 railway.

8.35 Within the EIF, at page 126, it is noted that:

'The project would serve diverse and growing markets for leisure and holidays, conferences, entertainments and the creative arts, and could be a major focus for investment and regeneration in the area.'

8.36 The EIF therefore spatially acknowledges the proposals for the London Resort in several diagrams and also within the supporting text. These are identified further in Appendix 4.0 of this Statement. It is clear the EIF anticipates and looks to plan and allow for the delivery of the London Resort and seeks to reflect how this will influence the masterplanning of other areas, such as Ebbsfleet Central. The principle of a global entertainment resort upon the Swanscombe Peninsula, with a London Resort Access Road leading through Ebbsfleet Central, is therefore recognised through the EIF – EDC's key delivery document.

Thurrock Council

8.37 There is no specific reference to the London Resort within Thurrock Council's Core Strategy and Policies for Management of Development (January 2015). This is because the development plan was adopted in early 2015 requiring much of the evidence base and plan preparation stages taking place in the years prior, while the London Resort was in its relative infancy. It is also the case that at that time, the Order Limits of the London Resort did not include any land within Thurrock, with the decision to extend the Order Limits north of the River Thames only taken in 2020 following LRCH's detailed review of its Business Plan in 2019/20. The original plans in 2014 and 2015 had identified the Port of Tilbury being utilised for construction but not any operational or visitor role which emerged as a result of consultation feedback and the Tilbury2 DCO providing additional opportunity.

8.38 However, the document does identify the significant development potential of Tilbury and included within that the Port of Tilbury. In short, Policy CSSP2: Sustainable Employment Growth promotes and supports economic development in the Key Strategic Economic Hubs. Tilbury is identified as a hub based on its key sectors of port, logistics, transport and construction. The inclusion and use of the Port of Tilbury by LRCH within the Proposed Development is therefore considered to offer both direct and indirect benefits and opportunities to the Port of Tilbury through the role it will play within the transport strategy for the London Resort. In a broad sense, therefore, the London Resort is considered to aide and support the principles set out within Policy CSSP2.

8.39 In addition, Policy CSTP28: River Thames identifies how Thurrock Council and its partners will ensure the economic and commercial function of the River Thames is promoted through new development proposals. The London Resort proposals within Thurrock, as a ferry terminal to transport staff and visitors to/from the London Resort, are intrinsically linked to the River Thames, providing a support role to the construction and operation of the London Resort. The Proposed Development is therefore considered to accord to the

principles established under Policy CSTP28 in that it will support and encourage interaction and engagement with the economic and commercial function of the River Thames. The Proposed Development therefore complies with Policy CSTP28.

8.40 While less explicit than the references contained within the development plan documents of the other host authorities of Dartford and Gravesham, the Proposed Development is therefore considered to complement the objectives identified within the development plan documents for Thurrock, suggesting an in principle support to the aspects of the Proposed Development north of the River Thames, subject to other detailed planning considerations.

Conclusion

8.41 As can be demonstrated from the above, the starting point from development plan documents from DBC, GBC and TC and the EIF produced by EDC provide strategic support towards the principle of the delivery of a global entertainment resort upon the Swanscombe Peninsula and supporting infrastructure at the Port of Tilbury. While different terminology may be used between and within the documents, in some cases there is clear implicit or explicit recognition of the emergence of the London Resort at the time of their plan preparation. This development plan recognition is considered to be significant and identifies 'in principle' support for the development of a world-class global entertainment resort upon the Swanscombe Peninsula. In this regard, the Proposed Development is considered to accord to the development plan documents.

8.42 Given the current economic conditions as a result of the COVID-19 pandemic, and the Government's emphasis on economic growth through the planning systems, the proposed job creation and other benefits are very important considerations. This is fully in line with the NPPF's objective of *'building a strong, competitive economy'* explored in Chapter 6 of the NPPF. In the absence of a NPS for business and commercial NSIPs, it is therefore considered the principle of the development in delivering substantial economic growth opportunities is to be fully supported through the NPPF and the aforementioned development plan policies at a local level.

MARKET OPPORTUNITY

Overview

8.43 While there is no specific requirement to establish and demonstrate the 'need' for the Proposed Development, in the absence of a NPS, it is considered helpful to demonstrate the market opportunity for a global entertainment resort, and specifically the benefits this will have in delivering the economic pillar of sustainable development, as promoted through the NPPF and development plan documents.

Tourism

8.44 As the *Economic and Regeneration Statement* (document reference 7.5) notes, the UK tourism market is large and growing in importance to the national economy. A number of

documents, as identified in Chapter 5 of this statement, identify a Central Government drive to improve and expand the tourism sector in an effort to drive international competitiveness in this area and further develop the economic potential of the industry. For example, the Tourism Action Plan and Visit Britain / Visit England – Our Five Year Strategy 2020-2025 both set out the principles of needing to grow the tourism base of the UK. In light of significant impacts to the tourism and hospitality sectors as a result of the COVID-19 pandemic, these desires are only likely to have increased in importance and significance since their publication.

8.45 The *Economic and Regeneration Statement* (document reference 7.5) notes that the large domestic tourist market in the UK reflects people's desire to spend money on leisure and experience activities, rather than traditional means of spending money through retail and on the high street.

8.46 The development of a global entertainment resort within the UK is therefore considered to deliver a significant attraction for the domestic and international tourism market within the UK. This alignment to wider Government strategies is considered to represent a material consideration given the nature of the Proposed Development.

Entertainment resort market

Entertainment resort

8.47 The *Economic and Regeneration Statement* (document reference 7.5) notes that the global entertainment resort market is typically segmented into three distinct segments:

- Level 1: theme parks – major ride parks and resorts with a distinct entertainment-based theme (examples include Disney, Universal Studios and Sea World);
- Level 2: ride parks and resorts (examples include Alton Towers Resort, Legoland Resort and Thorpe Park Resort); and
- Level 3: family leisure parks (examples include regional adventure parks and zoos).

8.48 The document identifies a relative stagnation in the UK theme park market which stands in contrast to the high levels of growth observed across the global market. Without even one Level 1 park, the UK is considerably underprovided in terms of global entertainment resorts. There is a distinct lack of 'Level 1' amusement parks in the UK, suggesting a market with great economic potential that could and should be exploited in line with the Government's tourism and leisure objectives highlighted above.

8.49 The *Economic and Regeneration Statement* suggests that if provision was on par with the typical rates of provision at comparable countries, the UK might expect to have two to three global theme parks, indicating a significant under-investment in the sector over the course of many decades, given the timescale for delivery of such attractions and the absence of any other known global entertainment resorts coming forward within the UK. Alongside this under provision, there is significant and growing demand for leisure and events in the UK and the local visitor catchment is growing.

8.50 The *Economic and Regeneration Statement* identifies that the UK's existing offering of theme parks has lacked growth in recent years, with attendance increasing only slightly by 0.6% over the past 10 years. The lack of growth demonstrates that the UK's theme park offering is not keeping pace with the international offering, making the UK less attractive to international tourists who may be seeking such experiences either in isolation or as part of a linked trip. Tapping into this growth is a significant to fulfil the Government's tourism and leisure objectives.

8.51 Legoland is the most visited theme park in the UK, and has been for a number of years, attracting 2.4m visitors in 2019. It was also the most recent major addition to the UK theme park market, yet that opened as long ago as 1996. This indicates no major theme park has been developed in the UK for over 24 years. The UK theme park industry has, however, seen significant investment planned to re-energise many existing entertainment facilities across the country but these relate to the expansion and diversification of existing attractions to provide enhanced accommodation facilities. LRCH is not aware of any other known major global theme parks planned within the UK, despite the significant growth in the leisure and theme park sector.

8.52 Furthermore, the *Economic and Regeneration Statement* predicts that the opening of the London Resort would have a minimal impact upon trade diversion from the UK's existing theme parks at the regional level owing to the growing demand and growing local visitor catchment. In essence, the London Resort is therefore expected to result in market growth, and ultimately help to grow the UK's share of the global entertainment resort market rather than providing direct competition *per se*. This is especially evident through the nature of the Proposed Development and the different offer being provided – for example the proposals for many of the rides and attractions over Gate One and Gate Two to be indoor.

8.53 The London Resort will have the ability to operate all year round as it will feature both traditional rollercoasters and rides but also 'black box' rides and other indoor areas and attractions, including the Water Park (see below). The London Resort is therefore capable of addressing need throughout all seasons of the year, and not just a summer offering. The offering of indoor rides and attractions is a further attempt to address need and provide a next-generation entertainment resort capable of keeping pace with technological advances for immersive experiences.

8.54 The principle of delivering entertainment resorts across two Gates is well-founded, recognising that there is a need to continually refresh and adapt to changing consumer requirements and to improve and extend the offer available at the London Resort to achieve repeat visits in line with a well-considered Business Plan. Such an approach is typical within the industry and has been deployed at a number of other global entertainment resorts such as Disneyland Paris.

Water Park

8.55 In a similar manner to global entertainment resorts, the UK Water Park market is less developed than internationally, with no UK Water Park making it into the top 20 global

list. Further details are provided within the *Economic and Regeneration Statement* (document reference 7.5). The delivery of a world-class Water Park as part of the Proposed Development will address a notable deficit within the UK. Co-locating such attractions offers considerable benefits in terms of a synergy, helping to elongate the duration of visitor stays.

Coliseum

8.56 The London Resort also proposes to expand into relatively new sectors such as immersive experiences and productions. The inclusion of a Coliseum which would host e-Sports events seeks to address a deficiency within the UK of a growing 21st century activity. The Coliseum will be a bespoke building comprising three key spaces arranged in a vertical stack to provide essential flexibility between functions. The lower level accommodating an 'Innovation City' will occupy the ground floor (lower level), the middle level and the main entrance level will accommodate a 'Games City' and the top level will have a 360° arena with a tiered seating for 2,500 visitors. Being an indoor activity, the Coliseum is also not susceptible to variable weather conditions found in the UK.

Conferention centre

8.57 The Conferention centre will be a building offering a flexible configuration of conference and exhibition facilities serving up to 4,000 visitors. Its largest room will be able to accommodate up to 3,000 people seated in a tiered configuration with split level balcony and the whole is sub-divisible. It is envisaged the building will be an important opportunity to showcase entertainment, leisure related events and new technology.

Conclusion

8.58 There is a clear opportunity for the London Resort to establish itself as a flagship destination for both domestic and international tourism sector. The *Economic and Regeneration Statement* (document reference 7.5) has identified significant demand for theme parks globally as well as the emergence of new entertainment channels in the UK specifically as a result of an under provision in recent decades.

8.59 The London Resort will provide a tourist attraction unlike any that currently exists in the UK. The London Resort will provide a diverse offer and scale, combining 'traditional' theme park elements such as outdoor rides and attractions, alongside 21st century 'black box' rides and other attractions such as the Coliseum and a Water Park which will provide the UK with a better basis on which to compete internationally for share of these experience and leisure-led market.

8.60 The introduction of a global theme park will help establish and consolidate Dartford, Gravesham and Kent on the map and make the area a must-visit destination, bringing new visitors to the area and supporting a range of economic activity. It will also have catalytic impacts, enabling further development, investment and economic dividend as discussed elsewhere within this Statement. The 'need' for the Proposed Development is therefore

an important consideration in striving towards sustainable development, most notably by delivering upon the economic and social objectives.

8.61 The market opportunity is therefore well-established.

REGENERATION AND ECONOMIC DIVIDEND

Overview

8.62 Within the National Policy Statement for Ports (January 2012), recognition is provided towards the positive impact port development can have upon tourism, specifically at paragraph 4.6.1. Paragraph 4.6.2 however also recognises possible adverse impacts such as severing or diverting established footpaths.

8.63 A significant and re-occurring theme of the NPPF relates to encouraging economic development, as one of three core pillars of sustainable development. Paragraph 80 notes that planning decisions should assist businesses investment with *'significant weight'* given to the need to support economic growth and productivity. In addition, paragraph 81 of the NPPF seeks to encourage planning policies (and thereby decisions) that establish:

'clear economic vision and strategy which positively and proactively encourages sustainable economic growth… economic development and regeneration'

8.64 At a local level, the development plan documents and the thrust of the EDC's EIF look to encourage economic growth through the delivery of appropriate development, regeneration and investment in infrastructure. Indeed, Ebbsfleet Garden City was established by the Government to achieve regeneration, the delivery of homes and creation of job opportunities not just within its area but also its reference to a *'wider regeneration impact area'* (page 9), of which the Swanscombe Peninsula is an integral part.

8.65 Policy CS 8: Economic Change of the Dartford Core Strategy (September 2011) seeks to transform the economy by focussing on growth sectors (which it identifies as including creative industries, hospitality and leisure and the built environment and construction) and Policy CS07: Economy, Employment and Skills of the Gravesham Local Plan Core Strategy (September 2014) provides for general priorities in the delivery of employment floorspace and job creation. Policy CSSP2: Sustainable Employment Growth of Thurrock's Core Strategy and Policies for Management of Development (January 2015) supports economic development in the Key Strategic Economic Hubs, to include Tilbury.

Figure 8-2: Key planning policy relating to need and economic dividend

NPS for Ports (January 2012)
- Paragraphs 4.6.1 & 4.6.2

National Planning Policy Framework (February 2019)
- Chapter 6: Building a strong, competitive economy

Dartford Core Strategy (September 2011)
- Policy CS8: Economic Change

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS07: Economy, Employment and Skills

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSSP2: Sustainable Employment Growth

Ebbsfleet Implementation Framework (2017)
- Pages 124-129

Background

8.66 Analysis of census data undertaken in the *Outline Employment and Skills Strategy* (document reference 6.2.7.7), indicates the areas of Dartford, Gravesham and Thurrock, particularly the riverside localities of Northfleet, suffer from a number of socio-economic issues. Indeed, the area around the Project Site contains some of the most deprived areas in England. There are also recognised problems with education and skills and unemployment. More specifically, the *Outline Employment and Skills Strategy* identifies socio-economic issues relating to:

- Slightly higher unemployment than geographical comparators;
- Pockets of long-term deprivation;
- Relatively low qualifications;
- Low productivity;
- Lack of vocational opportunities; and
- Low employment indicators for some under-represented groups (including women, ethnic minorities, 16-24 year olds).

8.67 As detailed within the *Outline Employment and Skills Strategy* one of the most pressing issues relate to the low skills base of the area. Residents hold fewer and lower level qualifications than all comparator areas, and the area is fairly deprived on the education, skills and training subdomain of the Index of Multiple Deprivation (IMD). Lower skilled jobs are more at risk of displacement, and thus the area is potentially vulnerable to disruption in a rapidly changing economy.

8.68 The summary of the socio-economic baseline also shows that there are local issues relating to unemployment, earnings and deprivation. There is also evidence of inequalities

among vulnerable groups, with differences in employment and economic activity rates by ethnic minority, sex and age. Engagement with local authorities during pre-application stages has confirmed these issues and the importance of policies and emerging proposals seeking to address them.

Assessment

8.69 As noted previously, the Swanscombe Peninsula has been identified as a significant regeneration opportunity for the delivery of economic and regeneration benefits within development plan documents for some time since the demise of previous industrial activities across the Kent Project Site, including those relating to quarrying and the cement industry that once dominated the Peninsula. This has been consolidated and enhanced through existing development plan documents and the Ebbsfleet Implementation Framework (2017) published by the EDC. It is therefore recognised the Swanscombe Peninsula has been identified, as a site, to be transformed to deliver economic and regeneration benefits linking to the local communities of Northfleet to the east, Swanscombe to the south, Greenhithe to the west and beyond.

8.70 The delivery of a transformative scheme, such as the London Resort, should therefore be wholeheartedly supported as a key driver in delivering this step-change to a long-standing regeneration site that forms an important part of the Thames Estuary. As this Statement and other supporting documents demonstrate, the potential economic dividends to be derived from the Proposed Development, both directly and indirectly, are substantial and of national significance. The London Resort is expected to have large scale economic benefits both locally and nationally with the benefits increasing as attendance grows from opening year in 2024 until maturity in 2038.

Economic growth

8.71 With the principle of developing a world class entertainment resort well-founded through development plan documents, it is important to recognise that the London Resort has the potential to be a significant economic driver locally, regionally and nationally. This is not only relating to major employment potential (both direct and indirect) but also the significant benefits in respect of economic expenditure and the supply chain.

8.72 This proposal would clearly generate substantial economic activity on implementation of the development to which significant weight must be attributed. While the proposals will result in the displacement of existing businesses and employment at the Project Site, principally within the Kent Project Site at areas surrounding Manor Way, London Road and Galley Hill, and a single residential building comprising three dwellings, the Proposed Development is anticipated to create a very significant net gain in employment opportunities (as discussed later in this Statement).

Regeneration

8.73 Within the Thames Estuary there are currently significant pockets of deprivation and low skills and education attainment. The Thames Estuary has long been recognised as by the

Government as a substantial growth and regeneration opportunity. The Thames Estuary has a long history of previous attempts to drive growth and productivity. It still suffers from high levels of deprivation, low skills and a high level of out-commuting.

8.74 The history to such is helpfully set out within the EIF (pages 10-11), the Kent Thameside Association was set up in 1993 by Kent, Dartford and Gravesham and major stakeholders including landowners and employers and the Regional Health Authority, to promote the regeneration of the area. This resulted in a series of reports, promoting the objectives and regeneration of the area, including Kent Thames Side: Looking to the Future (1995), Kent Thames Side: Looking to the Future Update (1997) and Kent Thames Side: Looking to an Integrated Future (1999).

8.75 The EIF notes at page 10 that during this time, the opportunity was recognised as early as the 1990s that

'The transformation of the nine miles of river front along the Thames, from an area currently characterised by heavy industry, power generation, mineral extraction and derelict under-used land (once containing a variety and mix of uses, overlooking the Thames) into a quality environment.'

8.76 The Government maintains its support for the growth and development of the Thames through the Thames Estuary Growth Board. The Thames Estuary Growth Board seeks to make the most of the region's unique assets and unparalleled location to turn its potential into sustainable growth for the local area and the national economy. The significance of the geographical location against the River Thames is acknowledged within all the development plan documents and the EIF.

8.77 The EIF identifies comprehensive areas or regeneration, including:

- Swanscombe Peninsula;
- Eastern Quarry;
- Ebbsfleet Green;
- Ebbsfleet:
  - Station Quarter North;
  - Station Quarter South;
  - Northfleet Rise;
  - Springhead;
- Northfleet Embankment West; and
- Northfleet Embankment East.

8.78 The London Resort would deliver the regeneration of significant areas of previously developed (brownfield and contaminated) land, representing in excess of £2 billion investment. The London Resort can be a catalyst to kick-start growth in the Thames Estuary, turning around an area with low skills and entrenched deprivation. The London Resort is expected to make development much more viable in the area, which has been demonstrated by the experience near Disneyland Paris, as discussed within the *Economic and Regeneration Statement* (document reference 7.5). It is considered the London Resort can be delivered in a comprehensive and collaborative manner alongside other regeneration efforts in the locality including, but not limited to Ebbsfleet, notably Ebbsfleet Central, where it is likely to have the greatest effect as a result of the London Resort Access Road passing through to reach Swanscombe Peninsula. Further assessment on this is undertaken in the masterplanning section below.

Construction workforce

8.79 Given the significant construction employment opportunities, it is estimated within the *Economic and Regeneration Statement* (document reference 7.5) that the construction workforce will spend up to £6.4m in the local area each year during the construction of Gate One and up to £2.2m for Gate Two. This is based upon the large number of construction workers, many of whom who will be living 'away from home' and living in temporary construction workforce accommodation (as discussed within the *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8)). The spend of the construction workforce in its own right therefore can be seen to make significant economic contributions locally.

Gross Value Added

8.80 Based on the Gross Value Added (GVA) per head in the Kent Thames Gateway area and the wider South East, it is estimated that existing employment across the Project Site currently generates approximately £50m in GVA.

8.81 The increased direct economic activity associated with the London Resort would generate approximately £245m of additional GVA in 2025 (the first full year of Gate One being open), rising to £520m in 2038 (maturity). The delivery of the London Resort is therefore considered to offer very significant uplift to the GVA from the Project Site over the existing baseline position, helping demonstrate the public interest in facilitating the displacement of existing businesses from the Project Site. The London Resort is therefore expected to directly create additional tax revenues of £150-200m each year by 2038.

8.82 Moreover, the GVA contribution estimated here is considered to be very conservative, significantly underestimating the true effect as it does not account for indirect and induced impacts and is based on conservative estimates of GVA per head. The investment will stimulate and provide business opportunities to local firms, including the growing creative sector. Indeed, the *Economic and Regeneration Statement* (document reference 7.5), highlights research into Disneyland Paris suggests multipliers far greater than those being conservatively estimated for the London Resort.

Conclusion

8.83 Much of the Project Site currently offers little by way of economic development, given it relates to areas of Swanscombe Peninsula, a former industrial area with pockets of contamination. Notwithstanding this, it is recognised other parts of the Project Site do include existing business and employment opportunities that require displacement.

8.84 The London Resort is a unique scheme proposing a scale of leisure and entertainment development not presently offered in the UK, and with very significant economic dividends including a projected £50bn in Gross Economic Activity and the creation of up to 48,000 direct, indirect and induced jobs by 2038. The regeneration and economic benefits are considered to be very substantial, generating significant economic dividend. In this regard, the delivery of the London Resort will accord to Policy CS8 of the Dartford Core Strategy (September 2011), Policy CS07 of the Gravesham Local Plan Core Strategy (September 2014) and Policy CSSP2 of Thurrock's Core Strategy and Policies for Management of Development (January 2015). The Proposed Development also reflects the aspirations of paragraphs 80 and 81 of the NPPF by delivering an economic vision, facilitating economic development and regeneration.

EMPLOYMENT

Overview

8.85 Chapter 6 of the NPPF seeks to ensure planning and development helps deliver a strong, competitive economy. This chapter relates to economic development. Paragraph 80 notes that:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'

8.86 At a local level, development plan policies across all local authorities seek to maximise employment opportunities. These were identified under the previous section but include Policy CS 8: Economic Change which specifically seeks to transform the economy by focussing on growth sectors including creative industries, hospitality and leisure and the built environment and construction. Policy CS07: Economy, Employment and Skills provides for general priorities in the delivery of employment floorspace and job creation while Policy CSSP2: Sustainable Employment Growth supports economic development in the Key Strategic Economic Hubs, to include Tilbury. Policy CSTP6: Strategic Employment Provision at part 10) seeks to enhance employment opportunities associated with major construction projects while part 11) supports the sustainable growth of the tourism industry.

Figure 8-3: Key planning policy relating to employment

National Planning Policy Framework (February 2019)
- Chapter 6: Building a strong, competitive economy

Dartford Core Strategy (September 2011)
- Policy CS1: Spatial Pattern of Development
- Policy CS8: Economic Change

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS07: Economy, Employment and Skills

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSSP2: Sustainable Employment Growth
- Policy CSTP6: Strategic Employment Provision

Ebbsfleet Implementation Framework (2017)
- Page 17, 37 & 124-129

Background

8.87 The EIF, at page 17, identifies one of the key delivery tasks of the EDC is to create a fully sustainable community, not a commuter suburb. The EIF raises concerns that the area around Ebbsfleet is serving as a commuter hub to London with high levels of out-commuting and poor skills retention in the local area rather than making use of its proximity to London to establish employment opportunities of its own. As noted within many of the development plan documents, the Swanscombe Peninsula offers a real opportunity to deliver significant employment to the local area, serving Dartford, Gravesham and Kent and reducing the effect of out-commuting.

8.88 The London Resort is anticipated to generate significant employment opportunities, in an area recognised for above average out-commuting, thus helping to redress the balance and contribute to the objectives of the host authorities and the EDC. The construction and operation of the London Resort is expected to generate significant opportunities for people to gain employment, upskill, and further their professional development. The jobs will vary in terms of the industry sector, the level of skills and experience required, the number of hours required and seasonality. LRCH is committed to ensuring that local residents benefit from these opportunities, addressing key socio-economic issues which many currently face.

8.1. LRCH is also committed to its employees, their welfare and wellbeing. This ranges from the quality of the working environment and the standard of accommodation and facilities provided to the important relationship that they will have with the surrounding community. The London Resort is not just providing jobs for employees but careers. Included within the Proposed Development is the London Resort Academy which will be capable of providing on-going training for those who wish to progress their skills,

experience and expertise, recognising that employee retention is a key factor in the success of the London Resort as a whole.

8.89 The *Outline Employment and Skills Strategy* (document reference 6.2.7.7) thereby identifies a number of priorities:

- Creating local employment opportunities;
- Providing career paths, not just jobs;
- Addressing skills gaps and promoting career choices through training and working with local schools, colleges and universities; and
- Celebrating diversity and inclusion.

8.90 The following paragraphs provide an overview of the estimated number of construction and operational jobs expected. Further detail is provided within the *Economic and Regeneration Statement* (document reference 7.5) and the *Outline Employment and Skills Strategy* (document reference 6.2.7.7).

Construction employment

8.91 Part f) of Policy CS8 specifically identifies the built environment and construction as a growth sector while Policy CSTP6 also identifies the opportunities for construction employment and training opportunities on major construction projects. The London Resort is a significant development which will require a construction workforce over many years, helping to support this vision. Moreover, the London Resort will require jobs relating to engineering, maintenance, grounds keeping etc. helping to deliver ongoing construction and maintenance related employment during its operational phase.

8.92 In terms of construction jobs, the *Economic and Regeneration Statement* (document reference 7.5) and *Outline Employment and Skills Strategy* (document reference 6.2.7.7) identify that the construction of the London Resort will generate approximately 23,300 gross job years, equivalent to approximately 2,320 Full Time Equivalent (FTE). The nature of construction roles is that they vary considerably both in skill sets and likely duration.

8.93 The development programme identifies construction over the period from 2022 to 2029, when Gate Two opens. It is estimated that 6,600-9,900 job years will be supported on-site during the construction of Gate One and 2,700-4,100 job years on-site during the construction of Gate Two, resulting in a total of 9,300-14,000 construction job years on-site (40%-60% of all construction job years). Taking into account phasing and the construction period for both gates, it is expected that there will be a peak on-site employment in 2023 for Gate One of 3,300-5,000 workers and in 2028 for Gate Two of 1,100-1,700 workers.

8.94 The London Resort is anticipated to support significant levels of both on-site and off-site construction. For example, it is expected that much of the Leisure Core, particularly the

themed rides and attractions, would be constructed off-site and then assembled on-site using specialist workers.

8.95 Chapter 7: *Land use and socio-economic effects* of the ES (document reference 6.1.7) includes an assessment as to the impact of the construction workforce on the local housing market, concluding the impact is to be classified as 'medium'. The *Construction Workforce Accommodation Strategy* (document reference 6.2.7.8) identifies the need for the provision of on-site accommodation provision for construction workers given the scale of the Proposed Development. This on-site provision represents embedded mitigation that helps address the temporary impacts associated with large numbers of construction workforce.

Operational employment

8.96 In addition to the significant employment opportunities arising from the construction of the London Resort over the period 2022-2029, there are substantial employment opportunities arising from the operation of the London Resort from 2024 when Gate One opens. As parts of the Project Site currently accommodate existing business and employment opportunities assessments have been undertaken to establish the nature and degree of the displacement, but also the associated net gain arising from the Proposed Development. Chapter 7: *Land use and socio-economic effects* of the ES (document reference 6.1.7), the *Economic and Regeneration Statement* (document reference 7.5) and the *Outline Employment and Skills Strategy* (document reference 6.2.7.7) provide a detailed review of the displacement of existing businesses and employment and should be referred to for full details. The following paragraphs seek to summarise the findings, identifying the significant net gain to be achieved through the Proposed Development, notwithstanding the disruption and localised impacts caused by the displacement of existing business operations and employment generating activities.

Displacement of existing businesses and employment

8.97 The Kent Project Site is characterised by high levels of manufacturing and 'transport and storage' related employment. Chapter 7: *Land use and socio-economics* of the ES (document reference 6.1.7) identifies that it is estimated that 1,040 FTE jobs across 94 businesses (with 69,000 sqm of commercial floorspace) will be displaced as a result of construction activity arising from the London Resort. It shows that 32 of the 94 businesses displaced are classified as 'bad neighbour uses', which includes uses such as heavy industrial functions.

8.98 It is accepted there will be an adverse impact upon existing businesses within the Order Limits that would be displaced. Matters surrounding displacement and associated compensation are discussed in Section 7 of the *Statement of Reasons* (document reference 4.1) but in summary, those displaced businesses will at the very least be properly compensated in accordance with the Compensation Code but the Applicant is also offering a more generous, enhanced compensation offer known as the London Resort Premium.

8.99 Manor Way, London Road, Galley Hill and Northfleet are all recognised as *'Identified Employment Areas'* within the Dartford Development Policies Plan (July 2017). Policy DP20: Identified Employment Areas notes that these areas are *'…important for providing storage, industrial and distribution services, and other business uses.'*

8.100 Policy DP20 notes that, within the three Priority Areas (as identified within Core Strategy Policy CS1), redevelopment at Identified Employment Areas:

'will be permitted only where it is clearly shown that significant overriding local economic and job benefits will be achieved, and also that any loss or re-location of existing employment uses is clearly justified.'

8.101 Policy CS1: Spatial Pattern of Development identifies the Thames Waterfront as one of three Priority Areas and this area includes much of the Kent Project Site. As detailed elsewhere within this Statement, and the *Economic and Regeneration Statement* (document reference 7.5), substantial local economic and job benefits will be achieved through the delivery of the London Resort. The test outlined in Policy DP20 for the redevelopment of the Identified Employment Areas affected by the Proposed Development (i.e. Manor Way, London Road and Galley Hill) is therefore considered met with clear justification through enabling the delivery of a NSIP.

8.102 In a similar approach, Policy CS07: Economy, Employment and Skills seeks to prevent the loss of Class B employment floorspace unless otherwise allowed by other policies within the Gravesham Local Plan Core Strategy (September 2014) or at least one of three conditions is met:

- that the proposals will deliver at least an equivalent number of new jobs (on-site or within the Borough) and be consistent with other policies;
- the existing premises are no longer suited for employment purposes, cannot be viably adapted and there is no demand following appropriate marketing exercise; or
- the existing premises have an unacceptable environmental impact or that an environmental benefit will arise from the existing use stopping that would outweigh the potential loss in employment.

8.103 On this basis, it is important to acknowledge that the strategic policies of the document support the regeneration of the Swanscombe Peninsula, as noted above and thus the first condition of Policy CS07 is considered met. Secondly, as will be discussed below, the Proposed Development is estimated to generate very substantially greater employment opportunities when operational. The policy test is therefore met. In addition, the last of the three conditions is also capable of being realised, with the opportunity for significant environmental enhancement as part of the Proposed Development and the proposed Biodiversity Net Gain (BNG), as will be explored in subsequent sections of this chapter.

8.104 The Proposed Development is therefore found to also be in accordance with the requirements of Policy CS07.

8.105 LRCH is exploring options for business relocation support. This has included discussions with Locate in Kent over what spaces might be available for displaced businesses. LRCH will pay relocation compensation to businesses displaced, but recognises that claimants may find it difficult to secure alternative accommodation both in the locality and also at similar entry level (rent/value) and is therefore making an enhanced proposal to qualifying claimants, known as the London Resort Premium.

8.106 In summary, the displacement of existing businesses and employment is necessary to facilitate the delivery of the London Resort. Through the displacement of these businesses, the London Resort will deliver substantially greater economic benefits, including a substantial uplift in employment opportunities (careers, upskilling), at a local, regional and national level justifying the displacement of existing businesses in the public interest and in accordance with Policy DP20, Policy CS1 and Policy CS07.

London Resort operational employment

8.107 The *Outline Employment and Skills Strategy* (document reference 6.2.7.7) notes that, at maturity in 2038, the London Resort is estimated to provide employment for an estimated 17,310 workers (11,215 FTEs), representing 16,775 (10,170 FTEs) more than the current site is estimated to support. The London Resort will therefore become one of the largest single site employers in the UK.

8.108 The *Outline Employment and Skills Strategy* further identifies that, by 2038, between 4,840 (low season) and 9,160 (peak season) local Core Study Area (CSA) residents (excluding those living on-site) could find work at the London Resort. The London Resort would therefore meet between 11% and 21% of the combined job growth aspirations of the CSA. This is considered to be a substantial contribution by the London Resort.

8.109 The nature of the jobs supported by the London Resort is across full time, part time and seasonal. They will also be supported across different aspects of the London Resort with opportunities across the theme parks, hotels, the Market, corporate and other elements. This will help address aspects such as skills shortages within the local area.

8.110 A provisional breakdown of job types and skills is given below:

- A large share (63%) of the jobs on offer would have low entry requirements. This means that those CSA residents who have low/intermediate qualifications could have access to these jobs.

- The diversity of jobs on offer would help transform the local economy. Opportunities would be available in distinct and diverse roles, such as lifeguarding, Food & Beverage (F&B) roles, management and entertainment. Local residents would have a wider selection of jobs to choose from, and a broader range of career paths available to build their futures on.

- Significant progression opportunities would be available. It is envisaged that promotion to team leader in areas as diverse as F&B, attractions supervision, and security would often be dependent on leadership skills, performance in entry-level

roles, and the experience gained there. The lack of degree-level qualifications may not be a barrier.

- A large proportion of jobs would be in the knowledge economy. The operation and general management of the London Resort would require the work of diverse professionals, from accountants, IT workers, legal professionals through engineers and marketing specialists. This could help increase productivity and create high-skill clusters in the CSA.

8.111 As can be seen from the above, assessments undertaken indicate there would be significant demand for employees in managerial and leadership roles (11% of total opportunities at maturity). At maturity it is estimated that about 27% of the roles would be highly skilled while 73% would have low entry requirements. This offers the opportunities to reflect both a skilled workforce but will also deliver jobs suitable across all levels, helping provide opportunities for those within the CSAs identified as being low-skilled and lacking qualifications. As a result, the nature of the London Resort's employment draw is that it can provide opportunities across a broad spectrum.

Career development

8.112 The Proposed Development includes the London Resort Academy, adjacent to the Visitor Centre which is on the north side of the London Road. The London Resort Academy includes a cluster of operational buildings, training facilities including classrooms, seminar rooms, specialist training areas and workshops, storage, kitchen, dining, a flexible relaxation area and parking. The London Resort Academy will be providing training for a wide range of staff to fulfil the diverse employment opportunities that the London Resort offers.

8.113 The London Resort Academy will also encourage career development for those who are already employed within the London Resort with additional training and skills development available. The provision of the Academy demonstrates LRCH's vision that the London Resort will not be about 'jobs', but building long term career opportunities for London Resort staff, a commitment to personal growth, encouraging long term employee retention to the benefit of all.

Employment and Skills Taskforce

8.114 LRCH recognise the importance of communication with all relevant stakeholders – local authorities, EDC, SELEP, education and training providers, job centres – through both the construction and operational phases of the Proposed Development. LRCH also recognises the benefits local engagement can provide with regards to local intelligence in which priorities can be targeted, thereby maximising local benefits.

8.115 To this end, LRCH is establishing an Employment and Skills Taskforce. The Taskforce will be a group formed of consultation bodies to provide guidance on the development of the *Outline Employment and Skills Strategy* (document reference 6.2.7.7). The Taskforce has held preliminary meetings and will continue to bring together schools, colleges and higher

education providers in a series of workshops to continue to inform the education proposals found within the *Outline Employment and Skills Strategy*.

8.116 This process will be ongoing throughout the construction of both Gate One and Gate Two. The *Outline Employment and Skills Strategy* is intended to be an evolving document, with the flexibility to adapt to new knowledge and issues as they arrive, as identified by LRCH and/or the Taskforce.

Supply chain and business opportunities

8.117 The London Resort has the significant potential to act as an opportunity to stimulate and provide business opportunities for many local firms across a number of sectors as suppliers to the London Resort. This may include, for example, local businesses within the creative industry (entertainers, artists, performers, actors, designers, musicians etc.) and general supply chain and operational matters (florists, hoteliers, security firms, catering etc.).

8.118 LRCH is committed to working with the supply chain, wider businesses and partners to ensure that employment and skills opportunities are accessible to under-represented and vulnerable groups.

8.119 LRCH also believes there will be a significant attraction of creative, IT and engineering business seeking to co-locate with the London Resort and with each other. An early version of the masterplan in 2015 contained an area of 'business hub' which recognised the significant potential for additional businesses. There is no longer scope to accommodate this element within the London Resort, but it is expected this significant demand could see strong interest in commercial space at the emerging Ebbsfleet Central area, which is at an early stage of re-masterplanning work.

Conclusion

8.120 The London Resort has the potential to be a significant employment generator, both during the construction and operational phases. Assessments undertaken have considered the existing baseline position of employment within the Order Limits and the businesses and level of employment expected to be displaced by the Proposed Development. It is recognised these displaced jobs are concentrated around the existing industrial areas around Manor Way, London Road and Galley Hill and many relate to industrial uses typically considered bad neighbours. Further commentary on the land acquisition aspects of displacement are provided within Chapter 11 of this Statement.

8.121 Given the significant scale of the London Resort, its construction will take place over many years for the delivery of the necessary infrastructure and the two gates, Gate One and Gate Two, opening in 2024 and 2029 respectively, the employment opportunities from the Proposed Development are significant. Conservative estimates indicate the London Resort will generate approximately 23,300 gross job years during construction, equivalent to approximately 2,320 Full Time Equivalent (FTE), and at operational maturity in 2038

employment for an estimated 17,310 workers (11,215 FTEs), representing 16,775 (10,170 FTEs) more than current businesses across the Project Site are estimated to support.

8.122 A provisional breakdown of operational employment opportunities by job type, skill level and nature (e.g. full-time, part-time and seasonal) has been undertaken, demonstrating a variety of opportunities that will respond to local requirements. It is considered the London Resort will help address issues of higher than average unemployment rates, lack of local jobs and high levels of out-commuting currently experienced and recognised as a significant economic drawback locally.

8.123 The significant reach of employment potential is therefore considered to exceed significantly the scale and significance of employment generating land uses promoted upon the Swanscombe Peninsula through development plans, namely the Dartford Core Strategy (September 2011) and the Gravesham Local Plan Core Strategy (September 2014). The opportunities for employment presented by the London Resort is a significant consideration in favour of the making of the DCO and weighs considerably in the public interest.

RELATED HOUSING

Overview

8.124 As identified within Chapter two of this Statement, the 2008 Act was amended to allow for the inclusion of 'related housing' within the NSIP process where there is a functional need or it is in geographical proximity to a project. As then subsequently described in Chapter five of this Statement through the description of development, the London Resort seeks to include such related housing for operational staff accommodation given the functional need and a masterplanning exercise which has identified a suitable location within the Order Limits such that it is also in geographical proximity to the project. Therefore, although not required to fulfil both, it is considered the staff accommodation would meet both 'tests'.

8.125 Chapter 5 of the NPPF identifies the pressing need for land for housing to ensure the adequate supply of land for housing and at paragraph 59 supports '*boosting the supply of homes'*.

8.126 Although not policy, guidance has been issued in respects of housing within NSIPs, known as Planning Act 2008: Guidance on Nationally Significant Infrastructure Projects and Housing (March 2017). Regard has been had to the guidance contained within, as discussed in the subsequent paragraphs.

8.127 At a local level, policies within the development plans also seek to ensure appropriate delivery of housing within their respective Boroughs. A number of detailed development management policies also relate to ensuring appropriate standards of design and residential amenity are achieved for future occupiers of residential accommodation, relating to matters such as appropriate, design, layout, communal and open space.

Development plan policies also seek to ensure the delivery of affordable housing from developments where appropriate.

Figure 8-4: Key planning policy relating to related housing

National Planning Policy Framework (February 2019)
- Chapter 5: Delivering a sufficient supply of homes
- Chapter 8: Promoting healthy and safe communities

Dartford Core Strategy (September 2011)
- Policy CS6: Thames Waterfront
- Policy CS17: Design of Homes
- Policy CS19: Affordable Housing

Dartford Development Policies Plan (July 2017)
- Policy DP7: Borough Housing Stock and Residential Amenity
- Policy DP8: Residential Space and Design in New Development

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- Policy CS06: Ebbsfleet (Gravesham) Opportunity Area
- Policy CS14: Housing Type and Size
- Policy CS15: Housing Density
- Policy CS16: Affordable Housing

Ebbsfleet Implementation Framework (2017)
- Throughout

Assessment

Functional need and geographical proximity

8.128 LRCH's detailed review of its Business Plan by the in-coming Chief Executive PY Gerbeau during 2019/20 established that the inclusion of 500 dwellings, being the limit set out within Government Guidance[8], would provide a significant benefit, offering and fulfilling a functional need by delivering high quality accommodation for staff directly employed in the operation and management of the London Resort while also being in geographical proximity to the London Resort, within the same contiguous Order Limit. The functional need arises from the requirement to support a 24-hour presence for staff on matters such as maintenance and security operations required in connection with the London Resort. The Proposed Development therefore includes for the provision of related housing to be

[8] Planning Act 2008: Guidance on Nationally Significant Infrastructure Projects and Housing (DCLG, March 2017)

operated as staff accommodation and located within Craylands Lane Pit, as shown on the *Illustrative Masterplan* (document reference 2.21).

8.129 It is expected the delivery of up to 500 dwellings will be provided in a phased manner running in parallel with the opening of Gate One in 2024 and Gate Two in 2029. It is anticipated up to 250 dwellings could be built in readiness for the opening of Gate One and the remaining 250 for Gate Two. It is further expected that the staff accommodation would typically operate at around a 90% utilisation rate, thus at full build out with a capacity of up to 2,000, only 1,800 staff are expected to reside on-site at any one time.

Related housing in certain locations

8.130 At paragraph 21, the Guidance notes

'Irrespective of whether housing is being provided on the basis of geographic proximity or functional need, in locations where specific policies in the National Planning Policy Framework indicate that development should be restricted, a lower number of dwellings, or no housing at all, is likely to be appropriate.'

8.131 The Guidance specifically identifies ecological sites (including SSSIs), land designated as Green Belt, with designated heritage assets and locations at risk of flooding, noting that the appropriateness of housing will be assessed against the relevant policies set out in the NPPF and the development plan.

8.132 In this regard, it is important to note the careful selection of Craylands Lane Pit given that it does not carry any ecological significance. Further commentary is provided below:

- The proposed location of the staff accommodation within Craylands Lane Pit is not located within any currently designated SSSI. The nearest such designated sites are the Swanscombe Skull Site SSSI (approximately 400m south west from the staff accommodation at its closest point) and Bakers Hole SSSI (approximately 650m to the south east). These assets have been assessed within Chapter 14: *Cultural heritage and archaeology* of the ES (document reference 6.1.14).

- The proposed location of the staff accommodation does not fall within land designated as Metropolitan Green Belt. As discussed further in this chapter, a small part of the Order Limits falls within Metropolitan Green Belt at the location of the A2(T) and A296 main roads approximately 2 km south of the staff accommodation. The relationship of the Project Site to the Metropolitan Green Belt is discussed further in Chapter 11: *Landscape and visual effects* of the ES (document reference 6.1.11).

- The proposed location of the staff accommodation does not contain any identified heritage assets, either archaeological or built heritage. The Grade II* listed Church of All Saints is located outside of the Order Limits to the immediate east but does not fall within the extend of the staff accommodation. This heritage asset has been assessed within the *Built Heritage Statement* (document reference 6.2.14.2) and reflected in Chapter 14: *Cultural heritage and archaeology* of the ES (document reference 6.1.14).

- The proposed location of the staff accommodation is not located within a Flood Zone and as such is considered suitable for residential development. This part of the site is separated from the areas at greater risk of flooding to the north by the elevated nature and topography of London Road. This is discussed further specifically within the *Flood Risk Assessment* (document reference 6.2.17.1) and the overarching Chapter 17: *Water resources and flood risk* of the ES (document reference 6.1.17).

8.133 In its carefully selected location within Craylands Lane Pit, the proposed staff accommodation is therefore not considered to be constrained by the content of the published guidance with regard to existing designations.

8.134 LRCH is aware of pre-notification stages by Natural England in their consideration of whether to establish a SSSI across much of the Swanscombe Peninsula. The draft pre-notification SSSI boundary includes the area known as Craylands Lane Pit where the staff accommodation is proposed. LRCH has responded to Natural England and is in regular dialogue on various matters in respect of the Proposed Development. It is considered very unlikely the matter of deciding whether to confirm the SSSI would be resolved before the end of the examination. In the absence of any such existing designation in the location of the staff accommodation then the merit of the inclusion of related housing remains. The outcome of any consideration on whether to confirm the Swanscombe Peninsula SSSI will not be known until into 2022.

Nature, operation and benefits

8.135 It is considered the staff accommodation will be *sui generis* in nature, not falling within any specific use class of the Town and Country Planning (Use Classes) Order 1987 (the 1987 Order), given the 'co-living' nature of the proposed accommodation.

8.136 Co-living is a relatively new housing model and currently lacks a clear universal definition in planning terms. However, it is generally understood to be a large scale purpose-built shared living development, comprising small private living units with extensive communal facilities, under single professional management. Each unit will comprise a cluster of en-suite rooms with shared kitchen and living room space. As noted within the *Design and Access Statement* (document reference 7.1), larger scale shared community spaces will be located within a podium structure at the base of, and shared between, groups of buildings. A small-scale local convenience retail offer will be located towards the western end of the staff accommodation site adjacent to Craylands Lane to serve the immediate needs of the community. Additional facilities will include shared workspace and quieter activities, recreational facilities, multifunctional spaces, gym, residents 'living room' and table game space.

8.137 All of the facilities will be actively managed through offices and staff located in the Galley Hill Staff Management suite, located immediately adjacent to the eastern end of the accommodation. This will enable staff to address any concerns that they might have, but also act as a booking centre. It will also be the place where the local community can go to address any management issues that might arise.

8.138 The masterplanning exercise has identified Craylands Lane Pit as the most appropriate location, being distinct and outside of the Leisure Core, but integral and in proximity to the wider resort. The layout and topography of Craylands Lane Pit also offer advantages, by providing a natural landscaped 'self-containment' from which the staff accommodation can benefit. The staff accommodation also provides a London Resort-related use that separates the London Resort from other existing residential properties, in this case the properties south of the North Kent Line in north Swanscombe. This resembles an appropriate adjoining land use in this location.

8.139 Guidance[9] stipulates that other development associated with that housing, such as local infrastructure, may also be included. It notes that any such development should be integral to the housing proposed and be proportionate to the scale of housing for which consent is sought. The proposed inclusion of small-scale convenience retail offer and the amenity and recreational facilities described above is considered wholly in keeping with the spirit of this guidance. The inclusion of a small-scale convenience retail offer is considered minimal but is nonetheless considered and commentated upon within the accompanying *Retail and Leisure Impact Assessment* (document reference 6.2.7.9).

8.140 The staff accommodation is strictly for use by London Resort employees and will not be available to the general public.

8.141 Chapter 7: *Land use and socio-economics* of the ES (document reference 6.1.7) summarises the assessment of the London Resort on the housing market. The provision of staff accommodation, which acts as embedded mitigation, will help relieve pressures on the existing housing stock and provide an accommodation option for employees who may be considering moving out of existing accommodation (for example staff who may still live with family), thus providing further justification for its inclusion. Given the significant employment potential of the London Resort, the staff accommodation (and linked to this the on-site accommodation for visitors) will help mitigate effects on generating a high demand on the local housing rental market.

8.142 The provision of staff accommodation will also assist the transport strategy of the London Resort, by removing the need for peak time commuting by the staff who reside in the accommodation as their place of employment will be within a short walking distance from their accommodation. This helps remove commuting journeys from the local road network.

8.143 The quality of the accommodation is very important for a number of reasons. It has to be of a high standard in order to attract staff to want to live there, it needs to provide the support that communities of this nature require, it also needs to be of a high quality as it will be in continual use and the management and maintenance are a key consideration. The use of high-quality materials and finishes will help to reduce and avoid maintenance requirements and the frustrations that can occur when things break down. It is in the

[9] Planning Act 2008: Guidance on Nationally Significant Infrastructure Projects and Housing (DCLG, March 2017)

London Resort's interests to make these facilities as easy to use as possible, exciting, durable and timeless.

8.144 The staff accommodation will also be designed so as to ensure high levels of amenity for the occupiers, with appropriate outlook and privacy from all habitable rooms. As the staff accommodation will benefit from its own facilities, this will help reduce pressure on other local amenities within Swanscombe. However, staff would also generate spend within the local economy outside of the London Resort. As demonstrated within the *Design Code* (document reference 7.2), the staff accommodation will benefit from landscaped areas and amenity spaces, set across three core areas. The staff accommodation will therefore comply with identified development plan policies such as Policy CS17 and Policy DP8.

8.145 Moreover, given a drive towards inclusivity and ensuring equal opportunities for all employees, it is expected that 10% of the staff accommodation will be wheelchair accessible, with step free access to all main residential buildings, also complying with criteria such as those identified in Policy DP8.

8.146 The London Resort will operate an effective management of the staff accommodation to ensure appropriate behaviour within this location and avoiding, for example, anti-social behaviour.

Affordable housing

8.147 The Guidance identifies that, in cases where there is no functional need and housing is granted consent on the basis of geographic proximity to an infrastructure project, affordable housing may be expected in accordance with any policies set out within development plans and secured through a Section 106 Agreement. However, as clearly demonstrated in the paragraphs above, there is an identified and well-justified functional need for the related housing and, as such, it is considered affordable housing provision does not apply. A restriction on the occupation of the accommodation to staff directly employed at the London Resort could be secured via legal agreement.

8.148 It is, however, worth noting that the staff accommodation will be offering additional choice of accommodation to staff, providing them with increased choice on where to live to suit budgets and desired accommodation type. This may be particularly pertinent for staff moving to the area for work. Staff may be offered accommodation on site but are free to decline and chose accommodation on the open market should that be more suited to their needs.

Conclusion

8.149 The 2008 Act was amended to allow for NSIPs to provide for related housing where there is a clear and identified need. LRCH has identified a clear need (as set out within paragraph 8.126 above) for the on-site provision of staff accommodation, utilising the provisions that allow up to 500 dwellings.

8.150 The on-site staff accommodation will be suitably located in a discrete and naturally self-contained element of the Project Site, within Craylands Lane Pit, helping generate a

community feel. The staff accommodation will achieve a number of direct and indirect benefits, including a beneficial option of accommodation to a proportion of its workforce, relieving pressure upon the local housing rental market and removing commuting trips that may otherwise have been associated with the workforce were the staff accommodation not available, therefore representing a sustainable residential location in accordance with policy principles set out at a national level within the NPPF and through local development plan policies.

8.151 In accordance with the basis of the aforementioned Guidance, and owing to an identified functional need, no affordable housing provision is considered necessary.

8.152 The staff accommodation would be well-designed, offering high quality staff accommodation within attractive landscaped setting. In this regard, the staff accommodation would conform to the requirements and aspirations of relevant development management policies.

RETAIL AND LEISURE IMPACT

Overview

8.153 Chapter 7 of the NPPF relates to maintaining the vitality of town centres. Specifically, paragraph 85 identifies the role of planning policies and decisions to:

'…support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.'

8.154 Paragraph 86 indicates LPAs should apply a 'sequential test' to applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations.

8.155 Main town centre uses are defined in the glossary to the NPPF (page 68) as

'Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).'

8.156 It is important to distinguish the 'retail offer' provided by the London Resort as it is unique and hence requires an understanding of the content as opposed to being treated the same as retail schemes generally. There is no global entertainment facility in the UK so there is no comparison or scheme which has been considered through the planning system. There

is however significant experience of visits to comparable entertainment resorts elsewhere in the world to help provide an informed approach.

8.157 There are key factors to take into consideration. First, the function of the proposed retail offer. This is primarily linked to the London Resort experiences and hence themed such that it allows merchandise to be purchased. The content is unique as there is unlikely to be any similar shop in the UK selling these products. Second, the retail uses are located within the overall London Resort, so either within the Gates (behind the payline) or within the Market (outside the payline) but still within the London Resort, and *en-route* to the transport interchange plaza. Finally, the nature of the retail content and location ensure this is a unique spend, and not at the expense of an alternative purchase elsewhere.

8.158 The uniqueness of the London Resort proposal and its relationship to other centres is demonstrated by the fact the Proposed Development will have a positive impact upon the existing nearby centres. The London Resort will attract very significant numbers of annual visitors, rising from 6.5m in the first full year of opening in 2025 up to 12.5m in 2038. Whilst a proportion of visitors will stay in the on-site hotels the majority will be either staying elsewhere or travelling. This will generate a significant increase in footfall in the nearby centres of Swanscombe Dartford and Gravesend, and also for Bluewater Shopping Centre. In addition, the creation of a significant number of local jobs will create greater local spending power which in turn will benefit the established shops and facilities in the existing centres.

8.159 The NPPF requires an impact assessment if development for retail and leisure development is over a locally set threshold (or 2,500m^2 of gross floorspace if a locally set threshold has not been set) and are not in accordance with an up-to-date development plan. The rationale for such assessments is the protection of established centres from competition.

8.160 At a local level, the Dartford Core Strategy (September 2011) includes an overarching strategic policy and identification of major redevelopment potential for Dartford Town Centre (Policy CS2) and a 'framework' for a network of centres across (Policy CS12). Dartford Development Policies Plan (July 2017) identifies a network of Retail Centres, District Centres and Neighbourhood Centres. Policy DP14: Retail and Town Centre Development identifies a threshold for an impact assessment when retail development is proposed of 500m^2, thus introducing a threshold significantly below the default 2,500m^2 contained within the NPPF. The policy does not identify a lower threshold for other main town centre uses besides retail. Further policies are set out across the retail hierarchy, including Dartford Town Centre Primary and Secondary Retail Frontages (Policies DP15 and DP16 respectively), District Centres (Policy DP17), Neighbourhood Centres (Policy DP18) and Food and Drink Establishments (Policy DP19).

8.161 Within Gravesham, Policy CS08: Retail, Leisure and Hierarchy of Centres of the Gravesham Local Plan Core Strategy (September 2014) specifies that impact assessments will be required where retail floorspace outside of the Primary Shopping Area exceeds 2,500m^2 and/or where proposals for leisure, entertainment and intensive sport facilities exceed 2,500m^2, consistent with the NPPF default position. Gravesend Town Centre is identified

as the highest order centre within the Borough and the preferred location for new retail, leisure and entertainment facilities, and the more intensive sport and recreation uses.

8.162 Office development is addressed separately under Policy CS07: Economy, Employment and Skills setting out the same sequential test in accordance with the NPPF and identifying an impact assessment threshold of 2,500m^2, again aligning to the NPPF.

8.163 The development of arts, culture and tourism development is addressed under Policy CS09: Culture and Tourism. Policy CS09 does not identify a threshold for impact assessment but states that:

'unless otherwise justified on the basis of a locational connection, functional justification… proposals involving arts, culture and tourism development will be directed in the first instance to Gravesend Town Centre as the sequentially preferred location for such development in advance of edge of centre and then out of centre sites'

8.164 Although not yet adopted, the emerging Part 1: Local Plan Core Strategy Partial Review and Site Allocations (October 2020) seeks consultation responses on retaining Gravesend Town Centre as the focus for retail, leisure and recreation growth. Emerging Part 2: Draft Development Management Policies Document (October 2020) identifies consideration could be given to reducing the threshold for impact testing for edge or out of centre proposals involving retail floorspace to 500m^2.

8.165 In respect of Thurrock Council, as the majority of the Proposed Development relates to the Kent Project Site it is not considered necessary to undertake a review of the impacts within the Essex Project Site. Any facilities within the Essex Project Site which include main town centre uses will be entirely ancillary to the provision of the 'Park and Glide' operations from the Port of Tilbury and are not considered to be of a scale or nature that would represent a risk to the vitality and viability of Tilbury Town Centre. For example, the retail and leisure facilities expected to be provided at the Port of Tilbury are expected to be limited to a small coffee shop. The scale of proposed main town centre uses proposed within the Essex Project Site would not therefore exceed the nationally set threshold of 2,500m^2. The Thurrock Core Strategy and Policies for Development Management (January 2015) does not set a local threshold.

Figure 8-5: Key planning policy relating to retail and leisure impact

National Planning Policy Framework (February 2019)

- Chapter 7: Ensuring the vitality of town centres

Dartford Core Strategy (September 2011)

- Policy CS2: Dartford Town Centre
- Policy CS12: Network of Shopping Centres

Dartford Development Policies Plan (July 2017)

- Policy DP14: Retail and Town Centre Development

Gravesham Local Plan Core Strategy (September 2014)

- Policy CS07: Economy, Employment and Skills
- Policy CS08: Retail, Leisure and Hierarchy of Centres
- Policy CS09: Culture and Tourism

Core Strategy and Policies for Management of Development (January 2015)

- Policy CSTP7: Network of Centres
- Policy CSTP8: Viability and Vitality of Existing Centres

Background

8.166 A detailed project description is provided within Chapter 3: *Project description* of the ES (document reference 6.1.3). An overview of the project description is also provided within Chapter four of this Statement. From both of these descriptions it can be observed that the London Resort is a unique and multi-faceted development. The nature of the London Resort, as a global entertainment resort, is such that its attraction and appeal as a destination relates to the diverse offering not only to the Leisure Core (comprising a range of events spaces, themed rides and attractions, entertainment venues and a range of restaurants, cafes and outlets linked to the London Resort experience across Gates One and Two) but also public areas outside the two Gates offering a range of related retail, commercial, dining and entertainment facilities in a sequence of connected public spaces including an area identified as the Market, hotels, Conferention centre and Coliseum. The land uses, taken as a whole, work together to form the visitor experience expected of a global entertainment resort.

8.167 The uses within the London Resort collectively create the entertainment facility, and thus it is too simplistic to disaggregate uses and consider them in isolation when their function and location is related to the overall mix – i.e. they are not uses and operators that would be located elsewhere if the London Resort did not exist.

8.168 The London Resort is a collection of entertainment and support uses. As is typical in such global scale facilities a 'payline' is operated which is a ticketed area behind which the attractions are included in the entry price (for example the rides and experiences). As described elsewhere it is envisaged Gate One will be a collection of 'lands' which reflect particular IP. Gate Two will also be behind the payline and again a collection of IPs delivered some five years after the main park opens. The London Resort has a public non-ticketed area outside Gates One and Two, which is largely centred on the Market. This is an area between the two Gates and comprises ancillary retail, themed food and dining, hotels and Water Park.

8.169 The nature of the leisure and related uses within Gates One and Two are very unique and would not be provided elsewhere – i.e. they are not in any locational competition with established centres.

8.170 The type of retail and other support uses outside the payline, for example in the Market are themed and targeted at attendees at the London Resort and do not represent mainstream retail activity or operators. These are related retail focused on merchandising and part of the London Resort experience – these will be shops reflecting the IP within the Gates. These are not formats which would otherwise be located elsewhere in nearby centres – they are integral to the on-site experience.

8.171 Outside of the payline it is intended that the London Resort will be attractive to visitors (perhaps during the afternoon or evening) from the local area and beyond which might include the use of the hotels, the retail, dining and entertainment area outside the payline and Gates One and Two. As such, it is necessary to consider how the main town centre uses outside the payline operate and their relationship and impact to existing centres locally.

8.172 To provide some analysis about the areas within and outside the payline then there is a breakdown of areas as identified in the Illustrative Masterplan (see next paragraph).

8.173 The *Illustrative Masterplan* (document reference 2.21), *draft DCO* (document reference 3.1) and *Design Code* (document reference 7.2) make allowance for a total of 26,695m^2 of retail and leisure uses outside of the payline. A further breakdown of this total is provided in Table 8-1 and is the basis for the accompanying *Retail and Leisure Impact Assessment* (document reference 6.2.7.9).

Table 8-1: The retail and leisure offering at the London Resort outside the payline

Location	Commercial offer	Description	Floorspace (sqm Gross External Area)
The Market	Food & Beverage (F&B)	Node 2 (similar to 'Borough Market')	6,000
	F&B	Sports bar	3,150
	Other leisure - secret cinema	London Resort themed secret cinema	3,250
	Other leisure - music venue	Music venue (25sqm NIA of which is own F&B offer)	2,500
Hotels and boulevard	Retail	Two units at 990sqm each in hotel either side of Boulevard	1,800
	F&B	12 units at 660sqm each in hotel either side of Boulevard	4,900
	F&B	Five units at 500sqm each in Boulevard courtyards	2,560
The Coliseum	F&B	Grab and go coffee and food offers across 3 floors (excluding seating)	395
Conferention centre	Other leisure - Arena	Arena (2,500 seats)	2,020

Location	Commercial offer	Description	Floorspace (sqm Gross External Area)
	F&B	Four fixed bar positions only open for events at the Conferention centre	120
Total			26,695

8.174 In line with national and local requirements, the following sections seek to provide commentary in respect of the Proposed Development and these recognised main town centre uses.

Sequential test

Overview

8.175 The Project Site is not located within any recognised centre and is not within 300m of a primary shopping area or 500m of a town centre boundary. The relationship of the Project Site to the key existing retail centres of Dartford Town Centre, Gravesend Town Centre, Bluewater Shopping Centre, Grays Town Centre and Lakeside is set out within the *Retail and Leisure Impact Assessment* (document reference 6.2.7.9).

8.176 National guidance makes it clear that the application of the sequential test should be proportionate and appropriate for the given proposal and recognises that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations, requiring robust justification. In the case of the Proposed Development, it is considered the London Resort is unique such that the sequential test is neither necessary nor appropriate, as will be discussed in further detail in the following sections.

8.177 The application of the sequential test must also have regard to recent Judgments by the Courts and decisions by the Secretary of State. With this in mind, three specific cases are worth further mention as follows:

- *Tesco Stores Limited v Dundee City Council (Scotland) [2012].* In this case, the Court held that the question of suitability of alternative sites in the context of the sequential approach was whether a site is suitable for the development proposed, not whether the development can be altered, changed or reduced to fit an alternative site;

- *R. [on the application of Zurich Assurance Limited trading as Threadneedle Property Investment] v North Lincolnshire Council and Simon Developments Limited [2012]*. In this case, the Court found that the sequential approach should be undertaken having regard to 'real world' considerations and that it should be applied having regard to the developer's requirement, in this case to operate the London Resort as a global entertainment resort; and

- *'Rushden Lakes' appeal decision (reference APP/G2815/V/12/2190175).* This case related to a called-in application by the Secretary of State (SoS). The SoS agreed with

the Inspector who heard the public inquiry who, in reflecting upon *Tesco Store Limited v Dundee City Council (Scotland) [2012]*, noted that the sequential test relates to the application proposal and whether it can be accommodated in its entirety on an actual alternative site in a sequentially preferable location available now, not at some point in the future. There is no requirement to disaggregate parts of the development to seek to accommodate them on smaller sites within a town centre.

8.178 The two Court cases and appeal decision above clarify that consideration should only be given to whether the Proposed Development can be accommodated in a sequentially preferable location in its entirety and does not require consideration of whether components of the application can be disaggregated to see if parts of the scheme can be located in sequentially preferable sites, beyond the existing split between inside the payline and outside the payline. As will be discussed in the subsequent paragraphs, this is considered particularly pertinent in the context of a global entertainment resort where the very function, operation and success of the London Resort relates to its scale and offer.

Assessment

8.179 The nature of the proposed main town centre uses within the Proposed Development is such that they have an intrinsic locational and functional connection to the operation of the London Resort, as a global entertainment resort. As will be discussed in further details within the impact section, the nature of the retail and leisure offer is considered to be very different to 'traditional' main town centres uses and are expected to appeal to a different target market, and not compete directly with existing main town centres uses within existing and established centres, such as Dartford and Gravesend.

8.180 The need for the main town centre uses found within the Proposed Development is necessary to enable the successful operation of a global entertainment resort and requires physical proximity to the other components. The global entertainment resort appeals to its visitors by bringing together a collection of uses that complement one another and collectively operate as a destination in its own right.

8.181 Chapter 4: *Project development and alternatives* of the ES (document reference 6.1.4) provides an overview of the site selection process that was undertaken in arriving at the Swanscombe Peninsula as the preferred location for the establishment of a global entertainment resort. The operator requirements for a global entertainment resort are complex including site selection criteria identified across planning, environmental, commercial and transport considerations. There are therefore significant constraints where such a global entertainment resort can be located. It is self-evident that a town centre or edge of centre site are unlikely to fulfil the requirements, not least the area of land available for the Proposed Development. These factors make such a development in proximity to a town centre location challenging and prohibitive. Moreover, the proximity of the Project Site to the River Thames is a significant benefit, facilitating the delivery of a sustainable transport strategy and more. Locations which are distance from the River Thames, or require complex connecting routes over public highway or areas under multiple ownership are therefore not considered reasonable or feasible alternatives. Owing to the nature of a global entertainment resort, its unique offer is the presence of

all the attractions within one location, enabling it to be explored during day trips and overnight stays to the site, there is no realistic operational or functional prospect of disaggregation of the proposed uses.

8.182 Nevertheless, a high-level sequential test exercise has been undertaken in respect of allocated and identified sites within Dartford and Gravesham to confirm sequentially preferable allocated sites are neither suitable and/or sequentially preferable. Sites within Thurrock have not been considered given the negligible scale of main town centre uses proposed within the Essex Project Site.

8.183 The first stage in a sequential test is to identify potential development sites in sequentially preferable locations. As the Project Site is in an out of centre location, this means looking to identify any in centre or edge of centre sites. The Project Site represents a total area of 413 hectares. However, large proportions of this relate to the marshes within the DCO Order Limits but on which limited, or no physical development is proposed. An alternative site would not be required to include such a land area and site specific requirements and so the sequential test was based on a land area representing the Leisure Core, car parking, staff accommodation and associated infrastructure representing an area of approximately 112.8 ha[10], as shown in the *Schedule of Accommodation* (document reference 7.3). It is not necessary, nor possible, to disaggregate the proposed collective uses of the London Resort which work together as a synergy to provide a global entertainment resort. For example, it is not possible for rides and attractions to be dispersed into 'silos' – the form and function of the London Resort is arrived at through its 'park' experience. It is therefore concluded there is limited scope for flexibility in the format and/or scale of the proposal and thus a site of 100 ha is required.

8.184 The second stage is to consider the suitability and availability of the identified sites.

8.185 A high level review of allocated sites within the Dartford Core Strategy (September 2011) and Gravesham Local Plan Core Strategy (September 2014) was undertaken, but no sequentially preferable allocated site within Dartford or Gravesend Town Centres are considered to be of the scale required to deliver the London Resort. For reasons previously explained, it is not possible (as it would remove the function of a global entertainment resort) nor necessary (reflecting case law) to disaggregate the land uses and spread them across multiple sites. The results of the high-level sequential test are provided at Appendix 7.0.

Conclusion

8.186 The Project Site is not located within any recognised town centre.

8.187 A high-level sequential test has been undertaken and has not identified any sequentially preferable sites. This conclusion has been reached given the intrinsic nature of a global entertainment resort and its scale, locational and operational requirements and the

[10] The sum of Work No.'s 1, 2, 3a, 3b, 5a, 5b, 6, 7, 8, 9a, 9b, 10a, 10b, 20

inability to disaggregate uses, even when considering reasonable flexibility from the operator requirements.

8.188 The high-level sequential test exercise that has been undertaken demonstrates there are no sequentially preferable sites where the Proposed Development could be located. LRCH has therefore demonstrated compliance with the sequential test.

Impact assessment

Overview

8.189 A *Retail and Leisure Impact Assessment* (RLIA) (document reference 6.2.7.9) accompanies the application. The RLIA document should be referred to for full details of the assessment, with the paragraphs below intended as a summary only.

8.190 The purpose of the impact test is to consider the impact over time on town centre vitality/viability and investment. The test relates to retail and leisure developments (not all main town centre uses) which are not in accordance with up to date plan policies and which would be located outside existing town centres.

8.191 The PPG notes that

'As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities.'

8.192 The PPG notes

'It is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could in itself constitute a reason for refusing permission.

The impact test will need to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible...'

8.193 For the purposes of the assessment, the impact is considered across the three host local authorities of Dartford Borough Council, Gravesham Borough Council and Thurrock Council, identified collectively as the Core Study Area (CSA). Given that the vast majority of the retail and leisure floorspace will be provided on the Kent Project Site, the assessment considers the impacts at two geographical levels – Dartford and Gravesham and separately the whole CSA. The impact upon retail and leisure in areas further afield is also considered within the RLIA.

8.194 Any facilities within the Essex Project Site which include main town centre uses will be ancillary to the provision of the 'Park and Glide' operations from the Port of Tilbury and are not considered to be of a scale or nature that would represent a risk to the vitality and viability of Tilbury Town Centre. Moreover, the scale of proposed main town centre uses

proposed within the Essex Project Site does not exceed the nationally set threshold of 2,500m^2 while the Thurrock Core Strategy and Policies for Development Management (January 2015) does not set a local threshold. For these reasons, main town centre uses at the Essex Project Site have been scoped out.

8.195 The impact assessment years are taken as 2025, 2030 and 2038 – the first full years of operation of Gate One and Gate Two and the year at which the London Resort is expected to reach maturity respectively.

Baseline

8.196 Chapter 3 of the *RLIA* (document reference 6.2.7.9) provides an overview of the retail and leisure offering within the CSA and the existing spend profile of CSA residents. Retail and leisure turnover are also estimated, providing the baseline against which to assess the impacts. The baseline is broken down into retail and leisure components that may be directly related to the potential effect of the London Resort.

Offering

8.197 The RLIA provides an overview of the retail and leisure offering within Dartford, Gravesham and Thurrock, as the CSA. A summary of the conclusions is presented below:

- Retail – comparison goods. In Dartford, of the total comparison floorspace (208,000sqm) the majority of comparison floorspace is found at Bluewater Shopping Centre, with other provision in Dartford town centre. In Gravesham, of the total (96,400sqm) the highest comparison floorspace density is in Gravesend town centre. In Thurrock, of the total (222,300sqm) key areas for comparison floorspace is at the Lakeside Shopping Centre and Lakeside Retail Park, with some less dense provision in Grays Shopping Centre.

- Retail – convenience goods. In Dartford, the provision of 17,800sqm is fairly dispersed, with a slight concentration in Dartford town centre. In Gravesham, of the provision of 52,200sqm, Gravesend has a low concentration as does Springhead. In Thurrock, of the total provision of 148,200sqm, Lakeside has a dense concentration of convenience floorspace, with Grays also hosting reasonably dense floorspace. The Asda Tilbury Superstore can also be identified.

- Food & Beverage (F&B). As with the comparison floorspace, the RLIA identifies Bluewater and Lakeside as providing the densest floorspace offering, with other important offerings in Dartford and Gravesend town centres. The RLIA notes both Dartford and Gravesend town centres appear to have a large number of smaller offerings, particularly in Gravesend.

- Leisure. The RLIA identifies the main leisure venues in Dartford as being the Cinema de Lux Bluewater – Showcase Cinema, Sir Peter Blake Gallery and The Orchard Theatre. In Gravesham, the RLIA identifies Woodville Halls Theatre (Gravesend), including the Blake Gallery and Paul Greengrass cinema. In Thurrock, two operational cinemas are

identified as the West Thurrock Warner Multiplex and the West Thurrock UCI Multiplex. The Thameside Theatre is part of the Thameside Complex; a multi-purpose arts venue that also includes Thurrock Museum, Grays Library and an exhibition area.

Vitality and viability

8.198 The RLIA provides an overview of the health of Dartford, Gravesend, Grays and Tilbury by considering vitality and viability. A summary of the conclusions is presented below:

- Dartford. Below average vacancy rates across district centres, with above average vacancy rates in Dartford Town Centre, partly explained by identified redevelopment opportunities. Low vacancy rates were noted at Bluewater Shopping Centre. The RLIA identified recent investment in the town centre shopping centres and a declining yield (a sign of investor confidence). Evidence suggests a need for increased diversification of Dartford Town Centre uses, which is likely to be more important following the COVID-19 pandemic.

- Gravesham. High vacancy rates within Gravesend Town Centre, including large units following the loss of large national multiples from the town centre. Gravesend has also experienced declining footfall. Evidence suggests a lack of larger commercial leisure offerings.

- Thurrock. Variable vacancy rates across main centres, but with only three of the 14 centres having above national average vacancy rates. Within Grays, a weighting towards retail floorspace was identified, contributing to a poor night time economy. Tilbury was also sown to have a high weighting of retail units.

Assessment

8.199 Paragraph 89 of the NPPF requires an assessment as to the impact of the Proposed Development on existing, committed and planned public and private investment in a centre and town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment. As noted above, the RLIA principally considers the CSA, being the key areas where impacts may be expected to arise. While it is feasible that retail and leisure centres outside the CSA may experience an effect it is expected to be less than those in the CSA as they are further away.

8.200 The RLIA has considered worst case impacts of the London Resort on existing and proposed CSA retail and leisure businesses. These worst-case impacts are explained within the document and are considered unlikely to materialise collectively. The level of impact is therefore likely to be highly overestimated. The impacts are split by those associated with the retail and leisure floorspace inside and outside the payline given the significance of the ticketed nature**.**

Impact on existing and planned investment

8.201 As noted elsewhere within this Statement, the London Resort represents a substantial investment with considerable economic benefits locally. It is considered the offer will

diversify the use mix of both existing and planned investment in the area. Considering the offer outside the payline specifically, the retail, F&B, and secret cinema will be London Resort themed providing a distinction to the existing and planned investment within the CSA, thereby increasing the variety in the area. Connected to the regeneration implications, it is expected the London Resort will attract new investment which will complement the heightened tourism market in the area, such as restaurants, bars and accommodation providers. Instead of deflecting investment, the Proposed Development will therefore likely encourage greater investment in existing centres.

8.202 The offer will build on the development of planned development, including Bluewater, Ebbsfleet Quarry and Ebbsfleet Central (among others). The retail and leisure will be distinct from these other developments and will be themed around, and complementary to, the London Resort.

8.203 Overall, the *Retail and Leisure Impact Assessment* concludes the proposals are likely to have a significant positive impact on existing and planned investment by further enhancing the attractiveness of the area.

Retail

8.204 As has been noted above, the nature of the retail offer is very different to 'traditional' High Street offer and in that regard is not considered to represent direct competition with existing centres, including those of Dartford Town Centre, Gravesham Town Centre and Bluewater Shopping Centre. The retail floorspace within the Market will typically centre on the retail of branded souvenirs, theme/content related merchandise and franchise matters related to Intellectual Property (IP) found across the London Resort, for example where there are specific themed rides or attractions. Despite the London Resort themed offer outside (and inside) the payline being sufficiently different to the existing and planned businesses in the CSA, the *Retail and Leisure Impact Assessment* conservatively assessed the trade draw impacts as if they were direct competitors.

8.205 Discussions have taken place with the owner of Bluewater Shopping Centre which have explored and challenged the robustness of the approach and assumptions being taken. It is understood Bluewater is supportive of the Proposed Development recognising the synergy of the London Resort to Bluewater by their differentiated offers, proximity and the economic benefits that the London Resort is expected to bestow on the local area.

Retail – comparison goods

8.206 The RLIA identifies that the London Resort is expected to have a net positive impact on comparison goods retail, increasing turnover by 0.3% at the Dartford and Gravesham level and 0.1% at the CSA level in all assessment years. Whilst the London Resort does provide some comparison retail floorspace in the RDE, the trade draw as a result of this provision is expected to be negligible. The comparison goods spend by visitors and workers living on-site within the staff accommodation at the London Resort is expected to more than offset this trade diversion.

8.207 Of the existing centres, Bluewater Shopping Centre will not experience any material threat to its viability from any worst-case trade draw. Crayford (Dartford) and Imperial Retail Park (Gravesham) are expected to experience the largest net increase in comparison spend relative to their turnover (0.5%), but this is still considered negligible. Dartford and Gravesend Town Centres are expected to see 0.4% increases in net comparison goods spend. Even based on this worst-case assessment, the overall impact of the London Resort upon comparison goods is expected to be positive, both across the wider Study Area and for all centres. No significant adverse impacts are therefore anticipated.

Retail – convenience goods

8.208 The RLIA identifies a net positive impact on convenience goods spend by workers given the only limited provision of convenience retail proposed as part of the staff accommodation complex at the London Resort. The London Resort is expected to increase spend by 0.8% at the Dartford and Gravesham level and 0.4% across the CSA. The impact at all existing centres will also be positive, with the turnover at the retail centres expected to increase by approximately 0.6%-0.7%. No significant adverse impacts are therefore anticipated.

Food and beverage

8.209 The RLIA concludes that F&B is expected to experience the largest negative net impacts. The impacts at Dartford and Gravesham geography are expected between -4.6% and -4.1% while at the CSA geography these impacts reduce to between -3.1% and -2.2%.

8.210 The majority of the trade draw impacts at the Dartford and Gravesham level are expected to be felt at Bluewater given its scale and offering. The net impact on turnover is expected be between -6.0% and -5.8%. However, owing to the nature of Bluewater and its significant regional role this impact is not considered to be significant adverse.

8.211 Whilst both Dartford and Gravesend Town Centres are expected to experience a similar market share of the impacts (15% and 14% respectively), the lower turnover at Gravesend Town Centre means that the overall impact is expected to be larger (between -5.9% and -5.6% at Gravesend compared to between -4.6% and -4.4% at Dartford). While impacts are identified, they are not considered to represent significant adverse impacts.

8.212 The RLIA notes that additional expenditure supported by activity associated with the London Resort, most notably the benefits provided by the expenditure of staff residing within the on-site staff accommodation within the local community, does reduce the level of impact. Overall, therefore, the RLIA concludes no significant adverse impacts are anticipated to arise across F&B.

Other leisure

8.213 The RLIA considers that cinemas and theatres within the CSA are expected to enjoy some additional spend as a result of staff residing within the on-site staff accommodation. However, it notes the trade draw from the impact of the potential secret cinema at the London Resort will result in an overall negative impact of between -1.6% and -1.5% at the

Dartford and Gravesham level and between -1.2% and -0.9% at the CSA level. This level of impact is deemed to be small and would not amount to a significant adverse impact. If the secret cinema was not provided as part of the Proposed Development, the impact across the CSA would likely be net positive.

8.214 Night clubs/music venues/disco/bingo are also expected to enjoy a small benefit from the residents of the on-site staff accommodation but, as with cinemas and theatres, this is not expected to be enough to offset the trade diversion of the music venue at the London Resort. The net impact is expected to be between -3.5% and -3.2% at the Dartford and Gravesham level and between -2.6% and -2.0% at the CSA level. This impact is also not considered to represent a significant adverse impact

Offices

8.215 No open-market office accommodation is included within the Proposed Development. While office space will be provided for within the Leisure Core, this relates to administrative offices necessary and directly related to the operations and functioning of the London Resort, without which it would not be delivered. As the office floorspace will be located within the Gate One back of house area and will not be let on the open market, there is not considered any need to consider or assess the impact of the negligible floorspace attributed to administrative and office functions as part of the Proposed Development. The RLIA did not therefore consider the impacts upon the office market.

Conclusion

8.216 The RLIA identifies that the Proposed Development is considered to have a very positive impact on existing and planned investment across the CSA, and wider afield, with the retail and leisure offer being very distinct from existing and future developments and will be themed around, and complementary to, the London Resort.

8.217 While impact from inside the payline has been considered, the RLIA has focussed on the impacts of the proposed retail and leisure floorspace found outside of the payline given the important distinction arising from the requirement to purchase tickets for entry for facilities and attractions within the payline. Impacts arising from floorspace outside of the payline have indicated:

- A net positive impact on comparison goods retail, with the negligible resultant trade diversion offset by spend arising from visitors and workers living on-site within the staff accommodation.

- A net positive impact on convenience goods spend arising from Resort workers, particularly those living on-site within the staff accommodation, as there is limited convenience trade proposed.

- A net negative impact is expected to arise from F&B, as a result of the provision of such units within the Market aspect of the Proposed Development. The impacts at Dartford and Gravesham are expected between -4.6% and -4.1% while at the CSA geography

these impacts reduce to between -3.1% and -2.2%. These are not deemed to be significant adverse.

- A net negative impact is expected to arise for other leisure, of between -1.6% and -1.5% at the Dartford and Gravesham level and between -1.2% and -0.9% at the CSA level. These are not deemed to be significant adverse.

8.218 In considering the above conclusions of the RLIA, while some adverse impacts are expected to arise for F&B and other leisure, these are not expected to be significant adverse. The Proposed Development is therefore considered to pass the impact test, complying with the relevant sections of the NPPF and aforementioned development plan policies relating to protecting the health, vitality and viability of identified centres, namely Dartford and Gravesend Town Centres.

8.219 It must also be remembered the RLIA has taken a worst-case approach, which are very unlikely to materialise in full. Moreover, if minor adverse impacts do arise in respect of retail and leisure, these must be considered alongside the significant additional benefits arising from the Proposed Development as part of the overall planning balance.

MASTERPLANNING

Overview

8.220 The NPPF, at paragraph 124, states that the creation of high-quality buildings and places is of fundamental importance to the planning and development process. It identifies that good design is a key aspect of sustainable development, the overarching theme of the NPPF. It further states that planning decisions should ensure developments function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character, establish a strong sense of place, optimise the potential of the site to accommodate an appropriate amount and mix of development and create places that are safe, inclusive and accessible.

8.221 The high level masterplanning and design ambitions of the NPPF are supported through development plan policies at a local level, including, but not limited to, Policy DP2: Good Design in Dartford of the Dartford Development Policies Plan (July 2017), Policy CS19: Development and Design Principles of the Gravesham Local Plan Core Strategy (September 2014) and Policy CSTP22: Thurrock Design of the Core Strategy and Policies for Management of Development (January 2015). All of the above policies encourage high standards of design to be achieved within developments. The EDC's EIF, at Section 3, also provides a spatial framework that outlines the structuring principles for the planning and design of Ebbsfleet, promoting high quality design. The EDC has also published a number of design guidance documents, including Design for Ebbsfleet: Design guidance for a characterful and distinctive Ebbsfleet Garden City (2018) and which sit alongside this the Ebbsfleet Public Realm Strategy and Ebbsfleet Sustainable Travel Strategy.

Figure 8-6: Key planning policy relating to masterplanning

National Planning Policy Framework (February 2019)
- Chapter 12: Achieving well-designed places

Dartford Development Policies Plan (July 2017)
- Policy DP2: Good Design in Dartford
- Policy DP4: Transport Access and Design
- Policy DP8: Residential Space and Design in New Development

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS02: Scale and Distribution of Development
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSTP22: Thurrock Design
- Policy PMD2: Design and Layout

Ebbsfleet Implementation Framework (2017)
- Throughout

Site challenges and opportunities

8.222 The regeneration of the Swanscombe Peninsula presents many challenges and opportunities. Accommodating the London Resort whilst embracing surrounding communities and enhancing the wildlife habitat that has evolved around this former industrial site has required considerable masterplanning efforts.

8.223 The accompanying *Design and Access Statement* (document reference 7.1), neatly captures the key site challenges and opportunities. In many respects, the site challenges have opened up the ability to create opportunities in developing a comprehensive masterplan that responds to the brief set by LRCH and devised over the many years of assessments and investigations. For example, the industrial past associated with the site has left behind abandoned Bell Wharf and White's Jetty which, given their condition and location, require significant works to bring them back into a serviceable condition, however when done so open up a significant opportunity to deliver on the London Resort's sustainability initiatives to maximise the use of the River Thames during both construction and operational phases. In this way, the challenge presented when responded to and addressed brings about a significant opportunity for the betterment of the Proposed Development.

8.224 The *Design and Access Statement* (document reference 7.1) identifies the following challenges/opportunities:

- Ancient history – significant human history associated with the site, demonstrated by the inclusion and proximity and inclusion of archaeological sites to the Project Site;

- Industrial past and future legacy – a notable industrial past relating to the cement industry, resulting in physical remnants, including topography impressions and contaminated ground;

- Bell Wharf and White's Jetty – evidence of the Project Site's history and importance in shipping cement products from this location on the River Thames;

- Infrastructure – the presence of notable hard infrastructure within, across and adjoining the Project Site, including the HS1 line and tunnels, power lines (including a super pylon), river navigation radar station and wastewater treatment facility;

- Topography – a transformative effect on the landscape through its industrial past, with quarrying creating chalk spines and pits;

- Flood defences – existing flood defences but with increasing risk through global warming, in association with important wetland and salt marsh habitats;

- Wildlife habitats, salt marshes, mud flats, reed beds and swales – a series of unmanaged marshlands as a result of nature reclaiming the post-industrial landscape, generating notable wildlife habitats;

- Connecting Communities – distinct established and emerging communities surrounding the Project Site, and the ability for the London Resort to integrate;

- Visitor Centre, Staff Training Facility and the London Resort Academy – opportunities for the London Resort's facilities to engage with the local communities;

- Pilgrims' Way and the River Thames – opportunity to re-vitalise a neglected historic pedestrian route from Swanscombe to the peninsula edge and beyond;

- Costal path – the integration of the emerging Coastal Path along the river frontage as part of a national route;

- Connecting Communities to the River frontage – ability to generate improve connectivity from Ebbsfleet International Station through the London Resort, to the Swanscombe Peninsula;

- The River Thames – exploiting the opportunity generated by the River Thames to deliver river-based travel options and connectivity for staff and visitors to the London Resort and others;

- Two theme parks and much, much more – opportunity to deliver significant areas of public interest and attractions outside of the paylines of Gates One and Two;

- Transport hubs – opportunity to deliver a new route connecting Ebbsfleet International Station, the London Resort and the ferry terminal to the north, promoting sustainable travel by train, bus, bicycle and walking;

- Interconnected spaces and places – potential to deliver interconnected places through the route from Ebbsfleet International Station through to the Swanscombe Peninsula;

- Back of house – ensuring back of house areas are attractive yet functional for the many London Resort workers and ensuring relationships with adjoining land uses; and

- Natural pockets – utilising the existing 'pockets' in the landscape formed by its history to the benefits of the masterplanning exercise, for example creating an area for tranquil and secluded staff accommodation.

Parameter-led approach

8.225 As discussed in Chapter six of this Statement, for practical reasons LRCH wishes to maintain flexibility about the detailed design of elements of the project, including the content of the London Resort core. At the same time, LRCH acknowledges the essential need to provide sufficient information about the project to inform the Environmental Impact Assessment (EIA) and the assessment of transboundary effects and the Habitat Regulations Assessment. To these ends, the EIA was undertaken in accordance with what is known as 'Rochdale Envelope' principles, described in Chapter 1: *Introduction* of the ES (document reference 6.1.1).

8.226 The *Works Plans* (document reference 2.5) include in some respects 'limits of deviation' which identify the horizontal and vertical alignment flexibility for some parts of the Proposed Development. The *Parameter Plans* (document reference 2.19) also introduce design flexibility through identifying height parameters, specifying 'up to' heights as building envelopes for various zones across the London Resort. This provides, for example, the flexibility for rides and attractions within Gate One and Gate Two of the London Resort to be renewed from time to time to respond to a dynamic commercial entertainment market. While such changes will be infrequent, identifying envelopes enables the assessments, such as EIA, to be completed, giving comfort that detailed assessment has been undertaken enabling such changes in the future.

8.227 The established parameters are a result of a combination of detail design, environmental effects and feedback during the consultation process. Mitigation has been considered where possible, and the proposed envelope is a result of that process.

8.228 The development of the *Illustrative Masterplan* (document reference 2.21) has included resilience testing of the illustrative scheme to make sure that the Proposed Development can be contained within the parameters illustrated.

8.229 When considering the parameter-led approach, it is important to recognise that built form does not seek to fill the available volume within the parameter plan envelope to its full extent. As described within the *Design and Access Statement* (document reference 7.1), the extent to which the built form will fill the respective parameter plan envelopes varies depending on the level of flexibility required. The *Design and Access Statement* gives the examples of rides requiring maximum flexibility while hotels developments are more known enabling the envelope to have a tighter fit. With the rides and attractions, a large

parameter envelope is given to allow for flexibility relating to the layout of roller coasters but they typically represent more 'light weight' structures within the parameter envelop rather than a massing which accommodates the entire volume of the envelope.

Masterplan evolution

8.230 The London Resort has evolved through extensive masterplanning exercise, benefiting from the work of many renowned experts in their field. The masterplanning process has sought to respond to the numerous site challenges and opportunities (discussed above), including the technical (e.g. contaminated land arising from its industrial past) and physical (e.g. topography) constraints. The masterplanning exercise has also sought to respond to the context in which it sits, with emerging development proposals within the wider Ebbsfleet area, such as at Ebbsfleet Central, and connections with existing residential-led communities.

8.231 The development of the masterplan has been an iterative, non-linear process, with many activities happening in parallel and informing one another. The masterplanners have been receptive to ideas, comments and criticism no matter the source, which has helped provide the opportunity to re-work and improve the emerging masterplanning concepts over time, whilst ensuring that flexibility is maintained to accommodate changing circumstance, events and emerging technology and that the overall project brief is met, delivering what is required of a global entertainment resort. Indeed, as noted in Chapter seven of this Statement and in further detail within the *Consultation Report* (document reference 5.1), regard has been had to the considerable feedback received both during and outside of the various statutory and non-statutory consultation exercise windows.

8.232 From the outset, therefore, it is helpful to understand the evolution of the *Illustrative Masterplan*. The masterplan approach has been guided and informed by various professional masterplanners, relating to both the masterplanning of the Project Site as a whole and developing a detailed design of Gates One and Two of the Leisure Core. The design within the Gates is very specialist, informed by global experts in their field with a deep understanding of the market needs, demands and flexibility for the Gates such as the provisions and make up of rides, attractions and public-facing experiences. The Gate design is also informed by LRCH's Business Plan and the recognised need for flexibility over time, given no decommission end date for the London Resort.

8.233 As covered in greater detail through the *Design and Access Statement* (document reference 7.1), a simplified account of the previous stages in the masterplanning evolution is as follows:

- August 2014: Farrells initial masterplan, incorporating Ray Hole Architects core resort design;
- April 2015: Farrells masterplan;
- July 2015: Farrells masterplan;

- October 2015: Farrells masterplan, with Gensler Architects core resort design;
- July 2017: Farrells land use plan, with Rethink core resort design;
- August 2017: Farrells masterplan with Rethink resort core; and
- May 2020: Apt masterplan.

8.234 The masterplanning exercises have thought critically about the nature of the Project Site and the constraints imposed upon it from many aspects, for example environmental, ground conditions and topography.

8.235 The majority of the masterplanning for the London Resort was undertaken by Farrells, a world-renowned masterplanning company. The Farrells work was in collaboration with various experts dealing with the leisure core of the theme parks. The Farrells work was led by John Letherland.

8.236 By 2019 John Letherland had retired from Farrells and other key personnel had moved to projects overseas. LRCH agreed to appoint Apt as masterplanners given the leadership of Robin Partington whose experience and track record was considered ideal for the London Resort, following a review of the project by PY Gerbeau. Apt worked with John Letherland during a scheme briefing and induction to ensure the intelligence and experience was retained, which in turn has ensured the masterplanning has continued as an evolving process.

8.237 Apt has worked with leisure industry experts on the layouts within Gate One to ensure this works operationally.

Masterplanning concepts

8.238 Key masterplanning concepts are discussed within Chapter 4 of the *Design and Access Statement* (document reference 7.1). While that document should be referred to for the detailed appreciation of the concepts deployed through the masterplanning exercise, a brief summary of the key concepts is highlighted below.

Heritage

8.239 The masterplanning process has sought to celebrate the heritage of the Project Site through its design, recognising and respecting features of value. This relates to tangible heritage assets that remain and less tangible aspects relating to the history, use and operation of the Project Site, including the industrial past to the Kent Project Site and the active port operations of the Essex Project Site. For example, the masterplanning exercise has sought to capitalise upon the heritage through the use of the Grade II* listed Riverside Station building at the Essex Project Site.

8.240 The masterplanning exercise has also sought to make beneficial use of the Pilgrims' Way historic route as principal pedestrian access from London Road to the London Resort,

across the Swanscombe Peninsula and to the river frontage and Bell Wharf and White's Jetty, which themselves have notable industrial heritage.

Public realm hierarchy

8.241 Through careful masterplanning, there is intended to be a subtle hierarchy to the arrangement of routes within and around the London Resort, helping to define spaces while adding to the operational functionality. The masterplanning exercise has introduced a 'central corridor', achieving a well-designed separation of the London Resort and enabling an effective layout that achieves Gate One and Gate Two. The masterplanning process has sought to utilise this space for navigation and provision of landmark features.

8.242 The public realm hierarchy and its interaction with buildings has been used to create points of compression and release, without interrupting the flow for operational, user experience and safety reasons. The *Design and Access Statement* (document reference 7.1) notes that increases in the widths of route create 'natural eddies' and space to create a setting for entrances into attractions or for cafes and restaurants to spill out and provide animation to the public realm.

8.243 In conjunction with ecological and public rights of access requirements, careful consideration has been given to the definition of routes and hierarchy across the Swanscombe Peninsula in encouraging recreational use by visitors and local residents.

Public space

8.244 The public realm and setting for the London Resort comprises a series of interconnected places and spaces in a coherent, fluid and adaptable form, with the capacity to manage expected visitor numbers. The *Design and Access Statement* (document reference 7.1) notes an important consideration within the operational brief is to make people feel comfortable, to avoid queues and congestion, which adds to visitor experience and assists operational aspects of the London Resort.

8.245 The masterplanning exercise has sought to utilise and deliver spaces and places ranging in scale from the main Plaza (which requires scale to help manage the flow of visitors between the main arrivals terminal and the entrance to the London Resort) to quiet corners, providing a 'refuge' from the hustle and bustle on a busy day.

8.246 Smaller flexible spaces outside the entrances to buildings will also help to attenuate visitors arriving for particular events within, but also offering a place-making opportunity in their own right.

Active facades

8.247 The *Design and Access Statement* (document reference 7.1) notes that an encouragement has been given towards active facades wherever possible given the significant contribution they can make to the animation of the public realm, helping buildings to exhibit a humane scale and engage with their surroundings, contributing towards a sense of place and address. The *Design and Access Statement* considers that the use of active

facades can also provide a level of passive policing to the public realm, helping people to feel welcome, safe and secure, discouraging antisocial behaviour.

8.248 The *Design and Access Statement* further suggests the use of active frontages acts as essential legibility that can often make spaces, places and the buildings they contain intuitive to use, avoiding the need for excessive signage. It is also identified that passive frontages alongside active frontages can help reinforce a sense of orientation but making key aspects (such as entrances) more obvious.

Shelter and shade

8.249 The masterplanning exercise has carefully considered the approach taken with regards to providing shelter and shade to enhance user experience in all weather conditions. For example, the murmuration of birds along the Boulevard will provide essential shelter and shade to visitors in the Boulevard while also offering high quality public art within the environment (see below). The design promotes the use of moments of respite along the interconnected spaces and places, including the various public footpaths and cycle ways that run across the marshes of the Swanscombe Peninsula, provide varying degrees of shelter from inclement weather or somewhere to sit and relax.

8.250 The *Design and Access Statement* considers that the inclusion of appropriate shelter and shade through features offer the opportunity to reinforce the quality of the development and a sense of place to the London Resort brand.

Public art

8.251 During the development of the *Illustrative Masterplan*, a number of opportunities have been identified to integrate public art within the London Resort's public realm and the surrounding landscape.

8.252 The *Design and Access Statement* (document reference 7.1) provides further details on the opportunities that are presented through the public spaces created, including permanent installations that serve a wider purpose. The *Design and Access Statement* provides examples of distinctive public art including the 'Foadarche' located at the centre of the Plaza with a circular display serving as a source of information for visitors, 'LONDON RESORT' in letters which are the scale of one story high and the murmuration of birds along the Boulevard providing essential shelter and shade to visitors in the Boulevard below whilst also acting as a foil for spectacular lighting at night.

8.253 All of these opportunities and more will be embraced as an integral part of a wider public art strategy which will be secured via a requirement.

Design Codes

8.254 As part of the extensive masterplanning exercise undertaken, a *Design Code* (document reference 7.2) has been established for each individual Works package across the Project Site, as identified within the *Works Plans* (document reference 2.5). The *Design Code* is

intended to inform the future design development of individual Works (usually comprising individual buildings) across the Project Site.

8.255 The glossary to the NPPF (page 66) identifies a design code as

'A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.'

8.256 As referenced within the above description, the *Design Code* works alongside the *Parameter Plans* (document reference 2.19) and the *Illustrative Masterplan* (document reference 2.21) to provide an understanding and reassurance of the design vision and the nature and quality of the built form to be delivered. The *Design Code* provides the primary design guidance to inform the subsequent design development for individual Works. In alphabetical order, these include:

- Back of house areas and infrastructure;
- Car parks;
- Conferention Centre;
- Coliseum;
- Hotels;
- Marshes;
- Offices;
- Plaza;
- Routes and roads;
- Staff accommodation;
- The Market;
- Theme Park – Gates;
- Transport terminal buildings;
- Visitors Centre and training facility; and
- Water Park.

8.257 The *Design Code* seeks to provide a commitment to high quality design, as promoted through national and local planning policy. However, the *Design Code* also recognises

where simplified designs can be achieved without compromising the overall design and appearance of the Proposed Development and need to be maintained for functional reasons. For example, many of the back of house buildings and facilities require large functional buildings to undertake their operations effectively, for example the maintenance of rides and attractions requiring large, open warehouse-style units. As these areas are also well-screened from public view, there is not considered to be any harm in simplifying the built form.

8.258 In essence, the *Design Code* can be considered design rules which focus on two and three dimensional elements of the design that build upon the masterplan, to ensure individual works not only respond to the immediate masterplan context, but provide clarity over what is considered to be an acceptable design quality.

8.259 Due to the unique nature of the London Resort and its offer, the *Illustrative Masterplan* (document reference 2.21) does not easily break itself down into an identifiable urban grain or easily defined character areas. There is limited repetition in building typology, and the relationship between adjacent buildings are as unique as the buildings themselves, helping to achieve a vibrant and unique sense of place. The *Illustrative Masterplan* relies on the relationship between buildings, key vistas and the public realm to ensure a masterplan is created which is legible to a large number of visitors who are unlikely to know the site and disorientating.

8.260 While the *Design Code* offers comfort as to the design intent and 'boundaries' of each Works package, the Rochdale envelope principle being deployed means the *Design Code* cannot be too prescriptive, and inherent flexibility has to be built in to allow the London Resort to evolve and develop to suit changing consumer requirements over time.

Relationship with the River Thames

8.261 At a local level, development plan policies for DBC, GBC and TC seek to promote and exploit the relationship of the authority's edges with the River Thames. In many cases, specific policies seek to connect development and communities to the River Thames frontage which is recognised as an economic, recreational/leisure and environmental resource.

8.262 A key factor in the site selection process included the Project Site's relationship to the River Thames which, while introducing challenges in respect of flood risk and the ecology-rich marshlands, was considered to offer substantial benefits by providing a unique setting for a global entertainment resort while opening up additional accessibility options – important for a land use which relies upon drawing visitors into a single location. The meander in the river also assists in forming natural boundaries to the London Resort.

8.263 The *Illustrative Masterplan* (document reference 2.21) has evolved over time to further exploit the setting alongside the River Thames. As noted in Chapter seven of this statement, a significant amendment between the two statutory consultation periods is a greater use of the River Thames through the inclusion of a 'Park and Glide' facility at the Port of Tilbury. This is a fundamental amendment made as a result of considered feedback

received and responding to adjustments to the transport strategy and the operational aspects of the London Resort.

8.264 Overall, the *Illustrative Masterplan* portrays the positive exploitation and relationship with the River Thames that embraces its opportunities, while sensitively and appropriately responding to its constraints. The relationship to the River Thames expressed in the Proposed Development is therefore considered to accord to development plan policies which seek to emphasis this unique opportunity presented to the Swanscombe Peninsula.

Relationship with the Broadness Marsh, Black Duck Marsh and Botany Marsh

8.265 The Project Site benefits from a location that finds itself nested between Broadness Marsh, Black Duck Marsh and Botany Marsh. From a masterplanning perspective the marshes help contain and establish a unique setting for the London Resort, offering a synergy for social and environmental gains.

8.266 The built form of the London Resort presented within the *Illustrative Masterplan* (document reference 2.21) has evolved as a result of consideration of the ecological and landscape requirements of the Project Site, principally across the Kent Project Site. A key objective of the *Landscape Strategy* (document reference 6.2.11.7) was to successfully integrate the London Resort landscape into the existing marshland landscape.

8.267 As noted within the *Design and Access Statement* (document reference 7.1), the London Resort enjoys this intimate relationship with the surrounding landscape and wildlife habitat. Effective integration has been explored between the London Resort and the natural environs beyond while allowing for the difference in characters to be maintained where necessary. Footpath and cycle routes will be improved to deliver an accessible and connective landscape that can be enjoyed. A number of routes create a 'light touch' boundary between two environments (the London Resort and the natural environment). Rather than a divisive line, the routes and linkages between the two are generous and have a character of their own, acting as effective landscaped buffers between the two sides, creating a transition and handover of one landscape to another. The *Illustrative Masterplan* envisages cases where the boundary is less clearly defined where a board walk meanders out into the salt marshes before returning further along the route.

8.268 As part of the landscape vision, the principle of bringing the marsh landscape into the London Resort is also sought through the use of rain gardens, swales and natural planting to manage surface water drainage, create a strong structure to the landscape and respond to the local site conditions.

8.269 The delivery of the London Resort will also be a driving force in interrupting the current ecological succession to maintain open mosaic habitat on the Swanscombe Peninsula as well as grassland and scrub. Without the Proposed Development, intervention to better maintain the marshes is less certain.

8.270 Overall, the *Illustrative Masterplan* seeks to establish a positive relationship with the marshes, improving public access so they can be celebrated more than is currently the case while sensitively and appropriately responding to ecological and conservation needs.

Relationship with topography

8.271 Although the landscape and topography of the Swanscombe Peninsula has largely been the result of human intervention, it has left behind a number of topographical features which the masterplan has sought to respond to and utilise to its advantage.

8.272 As noted within the *Design and Access Statement* (document reference 7.1), it is these features of accentuated height that can give structure to the *Illustrative Masterplan*, with the pockets of space created by the chalk spines, and the chalk pits that lie in between, creating appropriate settings for the different component parts of the London Resort, effectively mediating between the built form of the London Resort and that of the surrounding communities.

8.273 For example, the *Illustrative Masterplan* has sought to locate prominent buildings and uses, such as the Visitor Centre, in locations where the benefits of the topography can be maximised, in this case helping to provide a community overview to the development as it progresses. Another example is through the positioning of the staff accommodation within Craylands Lane Pit as, despite the relative proximity to the Leisure Core, the chalk spines provide a 'buffer', representing an opportunity for staff to 'escape' from the work environment and live within landscaped grounds. Other examples include how the low-lying levels across the marshes have also been considered, as described above.

Relationship with local communities

8.274 Within Chapter 2 of the *Design and Access Statement* (document reference 7.1), the existing local communities to the Project Site are identified. These include Swanscombe, Greenhithe and the Ebbsfleet Garden City in Dartford, Northfleet and Gravesend in Gravesham and Tilbury and Grays in Thurrock. Many of these communities are well-established, dating back hundreds of years given the rich history of the area however more recently, the Thames Estuary has seen significant regeneration efforts resulting in the delivery of new and emerging residential neighbourhoods and communities. For example, the delivery of Ingress Park to the west of the Swanscombe Peninsula to create a vibrant riverside community over the last decade and ongoing residential-led development within the Ebbsfleet Garden City under the direction of the EDC. The *Illustrative Masterplan* seeks to deliver relationships and integrations with all communities (old, new and those yet to emerge).

8.275 The *Illustrative Masterplan* seeks to achieve this by enabling sustainable local links to the London Resort and the areas beyond across the marshes. Further details are provided across the application documents, including the *Public Rights of Way Assessment and Strategy* (document reference 6.2.11.9).

Relationship with Ebbsfleet Central

Background

8.276 LRCH's site selection process took place in advance of the establishment of EDC and the request for a Direction of the London Resort as an NSIP by the SoS was concurrent to the announcement of EDC in March 2014.

8.277 LRCH has engaged with the EDC during the preparation of the Ebbsfleet Implementation Framework (EIF) (2017), which indeed followed four stages of consultation on the London Resort. The EIF, which is guiding the delivery of Ebbsfleet Garden City, identifies the general footprint of the proposed London Resort north of the North Kent railway as *'land subject to [the] London Entertainment Resort NSIP process'*. The EIF also identifies a transport connection between the A2(T) and the heart of the London Resort site on the Swanscombe Peninsula, running generally along the western side of the HS1 railway. These are shown on the images in Appendix 4.0 to this Statement. At the time of publication, the press release accompanying the EIF noted

'provision is made in the new plan for the London Paramount resort at Swanscombe with its proposed dedicated access route from the A2.'[11]

8.278 For many years, LRCH has been actively involved with Swanscombe Development LLP and with Ebbsfleet Investment GP Ltd (EIGP), a joint venture between Landsec and Swanscombe Development LLP, with regards to Option Agreements to deliver the London Resort, notably the London Resort Access Road, as it passes through Ebbsfleet Central. Planning permissions for Ebbsfleet from the mid-1990s for a very significant mixed-use scheme, with commercial at the Central area adjoining Ebbsfleet International Station (see Planning History below). LRCH and EIGP have held detailed and positive conversations relating to masterplanning in/around Ebbsfleet Central. EDC has acquired EIGP's land interests around Ebbsfleet Central and by way of an EDC:EIGP Call Option Agreement (dated 15 October 2019) an access corridor has been reserved to allow for a road to service the Swanscombe Peninsula.

8.279 The EDC held a procurement exercise from January to July 2020 to appoint a multi-disciplinary team to develop a masterplan for the Ebbsfleet Central site. LRCH has held regular dialogue with the EDC officers regarding the London Resort scheme and the route of the London Resort Access Road through the Central area. At the time of writing (December 2020) the emerging proposals for the Central area have not been disclosed so LRCH is unable to take into account any emerging masterplanning on the range and quantum of uses or their location. It is envisaged that engagement will take place in the first half of 2021 as the EDC prepares a planning application for submission in summer 2021.

[11] https://ebbsfleetdc.org.uk/future-of-ebbsfleet-garden-city-revealed-with-new-commercial-centre-and-city-parks/ [Accessed 23 July 2020]

Planning history

8.280 Ebbsfleet Central has a complex planning history owing to ownership arrangements and the cross-boundary nature of the site, straddling both Dartford and Gravesham and through the establishment of the EDC in 2015.

8.281 The original outline planning application was submitted by Blue Circle Properties Ltd in January 1996 to both DBC (DBC reference DA/96/00047/OUT) and GBC (GBC reference 19960035). It was a single cross-border application. The applications Proposed Development across a site of approximately 152 hectares divided into four separate quarters – Station Quarter North, Station Quarter South (both within DBC's administrative area) and Springhead Quarter and Northfleet Rise Quarter (both within GBC's administrative area).

8.282 The 1996 application was for outline planning permission with all matters reserved for a maximum of 789,550m^2 of mixed-use development, split across the following ranges:

- Employment – up to approximately 493,700m^2;
- Residential – up to approximately 310,420m^2 (3,384 dwellings);
- Supporting uses (schools, community facilities, local shops) – up to approximately 310,420m^2; and
- Core space (hotels, leisure, entertainment and supporting retail) – up to approximately 163,740m^2.

8.283 It was resolved to grant outline planning permission in 1998, with the Section 106 Agreement ultimately signed and outline planning permission granted in November 2002

8.284 Outline planning permission GBC reference 19960035 was varied under GBC reference 20120186 in August 2013. Essentially, this application was submitted in March 2012 and sought to establish a 'land swap' with the proposed dwellings for the Northfleet Rise Quarter being moved into Springhead Park and the commercial development from Springhead Park moved into Northfleet Rise Quarter. The effect was that the Springhead Park Quarter exhibited a residential-led focus and Northfleet Rise Quarter an employment-led focus.

8.285 During 2015, applications were submitted to vary both the DBC reference DA/96/00047/OUT and the more recent GBC reference 20120186. The former is understood to have been varied under DBC reference DA/15/00351/VCON while the latter varied under GBC reference 20150155.

8.286 A large number of other reserved matters, variation of condition, discharge of condition and modification of Section 106 Agreement applications have also been submitted and determined however the effect is there remains an extant outline planning permission at Ebbsfleet Central for extensive commercial-led mixed-use development (DBC reference DA/15/00351/VCON and GBC reference 20150155) for the development of land at

Ebbsfleet for mixed use up to 789,550m^2 gross floorspace comprising employment, residential, hotel and leisure uses, supporting retail and community facilities and provision of car parking, open space, roads and infrastructure. The key, but by no means exhaustive planning history is demonstrated in Table 8-2 below.

Table 8-2: Key Ebbsfleet Central planning history

	Dartford	**Gravesham**
Original	Reference: DA/96/00047/OUT LPA: DBC Decision: Approved Decision date: 2002 (date unknown)	Reference: 19960035 LPA: GBC Decision: Approved Decision date: 21/11/2002
Variation	-	Reference: 20120186 LPA: GBC Decision: Approved Decision date: 28/08/2013
Variation / extant	Reference: DA/15/00351/VCON LPA: EDC Decision: Approved Decision date: 23/02/2016	Reference: 20150155 LPA: EDC Decision: Approved Decision date: 24/02/2016

Ebbsfleet Implementation Framework

8.287 The Ebbsfleet Implementation Framework (EIF) (2017) sets out a vision for a proposed scheme at Ebbsfleet Central. Page 12 of the EIF notes that

'Ebbsfleet Central will become a dynamic new heart for Ebbsfleet, a major commercial hub and a centre of excellence for medical education and learning'

8.288 The supporting text notes that a diverse mix of uses will be supported, and references residential, health and leisure uses, with associated bars, restaurants and convenience shopping to support active and lively streets.

8.289 EDC's ambition for Ebbsfleet Central is stated to include:

- Creating an *'urban heart'* that complements the offer provided at Dartford Town Centre, Gravesend Town Centre and Bluewater;
- A *'commercial core'* with a diverse range of employment opportunities;
- Encouraging *'inward investment targets'* including medi-tech, biosciences and related research and innovation;
- The provision of city-wide social infrastructure including health and education;

- A transport hub, connecting Ebbsfleet International Station and Northfleet Station, integration of Fastrack and accommodating visitors to the London Resort;
- Improved pedestrian and cycle linkages;
- High density urban development;
- Major new parks and quality public realm;
- High density residential development in Station Quarter North and Station Quarter South; and
- Provision of utilities infrastructure.

8.290 An extract from the EIF in respect of Ebbsfleet Central is provided in Appendix 4.0.

London Resort Access Road

8.291 LRCH undertook assessment work with EIGP in 2015-17 regarding the precise alignment of the London Resort Access Road and to understand the challenges with any enclosure (also referred to as decking). This was to understand whether there was any environmental necessity to enclose part of the London Resort Access Road and to understand the design, engineering and delivery implications.

8.292 The key issues with the enclosure of the London Resort Access Road through Ebbsfleet Central are summarised below:

- *Structural*. There are detailed and numerous standards for the design, operation and maintenance of road tunnels within the UK. It is generally undesirable to have bidirectional traffic in tunnel cells as this can have significant implications with regards to ventilation (a bi-directional tunnel has a tendency towards a null net flow if the traffic in each direction is similar leading to pollutants remaining in the tunnel without mechanical ventilation support), safety and operational efficiency. As a result, twin-bore tunnels will be required to deliver the London Resort Access Road which results in increased technical standards (see below) and the scale of the tunnelling structure. When providing for multi-bore tunnels cross passage doors between each bore at regular intervals will be required to ensure adequate safety. As a result, a four-lane twin-bore tunnel with cross passage would require a width of approximately 34m and a height of approximately 9m – a substantial structure. By contrast, it is estimated a four lane open London Resort Access Road would be approximately 20m wide.
- *Technical.* A tunnel of this length (approximately 750m) may not require a mechanical ventilation system as a mandatory requirement, however, the experience of specialist consultants advising LRCH suggests that a forced ventilation system is probably required to achieve the required levels of safety. Mechanical and electrical ventilation equipment requires significant space and cannot be easily retro-fitted. Plant rooms will be required at each portal to facilitate this. Ventilation systems add significantly

to the complexity and the cost of delivering tunnelled structures and the ventilated air will be concentrated in terms of pollutants.

- *Fire and safety.* Evacuation requirements when constructing/operating a tunnel result in considerable practical difficulties and significantly increase the size and scale of a tunnel structure. The length of the tunnel would require notable cross passage fire access/egress at regular intervals and possible external egress routes. Any proposed tunnelling would likely be a "Category A" tunnel which can require the provision of emergency facilities (telephones, fire extinguishers, pressurised fire hydrants, emergency exit signs, lane control and tunnel closure signs/signals, emergency stopping lane, emergency walkway, ventilation for smoke control, radio rebroadcasting system, traffic loops, CCTV, fire hose reels and/or escape doors).

- *Operational/maintenance.* The equipment required for the safe and effective operation of any tunnels would need plant rooms at each portal which are capable of providing power for lighting, signage, ventilation and fire protection along with a communications system for maintenance and emergency.

8.293 For the reasons identified above, decking the London Resort Access Road through Ebbsfleet Central introduces substantial structure, technical, fire and safety and operational/maintenance issues over a non-decked alternative. It was recognised by EIGP that a deck was not needed as any environmental effects could be mitigated where required, plus the implications of such a structure would not provide any viable benefits.

8.294 The previous paragraphs identify a clear rationale for the London Resort Access Road to remain open through Ebbsfleet Central and not decked. This has been evident for a number of years as detailed work and consideration of options has progressed with stakeholders and partners, including EIGP.

8.295 EDC has highlighted a number of technical areas relating to an open London Resort Access Road to be considered during its masterplanning approach, including visual impact, noise and air quality. While LRCH does not necessarily share these views, the below paragraphs identify on a without prejudice basis how any residual impact of an open London Resort Access Road could be successfully mitigated so as to not prejudice the Ebbsfleet Central masterplanning exercise.

- Visual impact. As a result of the topography of the site and works proposed, the London Resort Access Road is generally to be set at low level within cuttings making the road infrastructure less visible. The London Resort Access Road's 'presence' within the area is therefore not considered to create a dominant or imposing feature in the urban landscape.

- Noise. A significant benefit of locating the London Resort Access Road as close as practically possible to HS1 is the existing background noise levels generated by the operation of HS1 and the greatest separation distance from existing residential land uses to the west. It is anticipated land uses within Ebbsfleet Central will be commercial in nature providing different susceptibility to noise impacts than residential.

Moreover, Ebbsfleet Central is of a sufficient scale and masterplanning of relative infancy such that any noise sensitive receptors (such as residential) can be designed to avoid any possible conflict with the London Resort Access Road. Notwithstanding this, additional mitigation options can be considered to reduce any residual noise impacts arising from the London Resort Access Road, such as acoustic fencing and landscaping where appropriate.

- Air quality. The impacts of air quality along the London Resort Access Road have been considered with initial assessments indicating that the effects are not expected to be significant. Moreover, since earlier discussions with EIGP, the transport strategy for the London Resort has changed with a significant emphasis on the use of the River Thames for both visitor arrivals and servicing. In conjunction with revised business planning, this has resulted in fewer vehicle movements anticipated to use the London Resort Access Road than in previous forecasts during discussions with EIGP in 2016/17. In conjunction with improving technology (e.g. electric vehicles) and increasingly stringent legislative requirements on vehicle emissions, it is considered there is the potential for further improvements to air quality along the London Resort Access Road in the future.

8.296 It is therefore considered there is no justification for the decking of the proposed London Resort Access Road through Ebbsfleet Central and that is the basis of the proposals as part of the London Resort DCO. The proposed London Resort Access Road would not compromise or prejudice the EDC's ambitions to deliver the masterplanning objectives for Ebbsfleet Central as set out within the Framework. It is also important to acknowledge that the Framework has always been aware of the proposed routing of the London Resort Access Road through the location to deliver the dedicated route to the London Resort when located upon the Swanscombe Peninsula.

Security and safety

8.297 The NPPF, at paragraph 95, specifically identifies the importance of promoting public safety and taking into account wider security requirements, including *'anticipating and addressing possible malicious threats… especially where large numbers of people are expected to congregate.'* Footnote 41 identifies many of the proposed uses contained within the Proposed Development, such as transport hubs, night-time economy venues, cinemas, theatres, arenas, shopping centres, hotels, restaurants and visitor attractions. At a local level, development plan documents encourage and require designs to appropriately take into account high quality design principles that serve to 'design out' opportunities for crime and anti-social behaviour.

8.298 From the outset, LRCH has been committed to ensuring the safe and secure construction and operation of the London Resort. As such matters surrounding the safety and security of the London Resort for staff and visitors alike has been at the forefront of the proposals and in arriving at a resilient masterplan.

8.299 A *Security Planning Report* (document reference 7.8) accompanies the application. The document sets out the security design principles taken into account during the

masterplanning exercise. For obvious reasons, the *Security Planning Report* is high level as does not identify specifics in relation to the Proposed Development to protect sensitive matters and not compromise the safety and security of the London Resort. The security design principles have, however, thoroughly and robustly informed the masterplanning and detailed design of the Proposed Development, in consultation with all necessary stakeholders as discussed in the following paragraphs.

8.300 Liaison with the Counter Terrorism Security Advisors and Designing Out Crime Officers was established to assist in the compilation of the Security Threat and Risk Assessment, which forms the foundation of the security strategy for the London Resort. The Kent Resilience Forum (KRF) has also been consulted throughout the design process to ascertain the expectations and requirements of the various emergency services and key stakeholders, as well as building the foundations for strong collaboration moving forwards. The KRF benefits from representatives from all key emergency services (Kent Police, Kent Fire and Rescue, South East Coast Ambulance Service) as well as local and district authority representatives, rail stakeholders, and representatives from Dover Port Authority and the Channel Tunnel.

8.301 The Proposed Development is considered to fully accord to planning policy principles set out within the NPPF and relevant development plan policies which require developments to achieve safe and secure public and private spaces. LRCH does, however, recognises that the response to threats does continue to evolve and the Proposed Development will be continually assessed from an operational perspective in conjunction with LRCH own experience and management policies.

Displacement of existing businesses

8.302 As noted in previous sections, the displacement of businesses will arise as a result of the London Resort. As explored further within Chapter 10 of this Statement, the masterplanning exercise has worked carefully to ensure minimum land take to achieve the successful delivery of a global entertainment resort in this location. The Order Limits have been the subject of continual, iterative review alongside the masterplanning exercise to ensure all land included is required and appropriately justified. It is the case the extensive masterplanning process has indicated that the Proposed Development requires the land affected generating the displacement of existing businesses.

Displacement of residential accommodation

8.303 The London Resort needs to acquire the three dwellings contained at the 19 London Road address in order to construct the Visitor Centre and also to create an entrance to the London Resort along Pilgrims' Way. In much the same way as the displacement of existing businesses, the displacement of a single residential building comprising three dwellings has been unavoidable through the masterplanning exercise given its relatively central position within the Order Limits.

Conclusion

8.304 The London Resort has evolved over many years of thorough masterplanning and critique, aligning to a complex business plan given the unique nature of a global entertainment resort. LRCH has appointed nationally and internationally renowned masterplanners to advise on, critique and develop the *Illustrative Masterplan* (document reference 2.21) of the London Resort as a whole and the masterplan within and across the Leisure Core. The process has seen considerable input which reflects the unique site characteristics and opportunities arising from its geography, history and topography.

8.305 For practical reasons LRCH wishes to maintain flexibility about the detailed design of elements of the project, including the content of the Leisure Core. As a result, the masterplanning approach has taken a parameter-led approach, incorporating flexibility but undertaken in accordance with 'Rochdale Envelope' principles allowing a robust assessment through the EIA process.

8.306 The *Illustrative Masterplan* is well-thought through, evidenced and justified in all regards. Each component of the masterplan has been taken through an iterative design process with LRCH and the consultant team to stress-test the shape, form and function of the buildings and their location and role towards place-making as a whole within the masterplan. Critique has also been undertaken to reflect operational, safety and security requirements.

8.307 The *Illustrative Masterplan* is considered to represent the very highest standards of masterplanning and design, in accordance with the place-making principles identified within the NPPF, development plan documents and the Ebbsfleet Implementation Framework. The proposals accord with the objectives of the identified planning policies.

CULTURAL HERITAGE AND ARCHAEOLOGY

Overview

8.308 The NPS for Ports (January 2012) at paragraph 3.3.3 seeks to *'ensure that access to and [the] condition of heritage assets are maintained and improved where necessary'*.

8.309 A similar approach is taken within the NPPF which identifies a clear approach to the protection of heritage assets. Chapter 16 of the NPPF places a strong emphasis on such assets being an irreplaceable resource and as such should be conserved in a manner appropriate to their significance. The NPPF requires Applicants to describe the significance of any heritage assets affected including contribution made by their setting. Significance, in respect of heritage policy, is defined in the glossary to the NPPF (page 71) as

'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For

World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.'

8.310 Proposals with a potential archaeological interest are also expected to submit an appropriate desk-based assessment and field evaluation, where necessary.

8.311 Not unsurprisingly, a similar approach is contained within development plan policies. For example, the protection of heritage assets and their settings are promoted within Policies DP12: Historic Environment Strategy and Policy DP13: Designated Heritage Assets of Dartford Development Policies Plan (July 2017), Policy CS20: Heritage and the Historic Environment of the Gravesham Local Plan Core Strategy (September 2014) and through Policy CSTP24: Heritage Assets and the Historic Environment and Policy PMD4: Historic Environment of the Thurrock Core Strategy and Policies for Management of Development (January 2015).

8.312 *'Protect, reflect and celebrate the rich heritage of Ebbsfleet's communities'* forms one of the objectives of the Ebbsfleet Implementation Framework (EIF) (2017) and its 'Civic Community' vision. References to preserving and celebrating cultural heritage are found throughout the document.

Figure 8-7: Key planning policy relating to cultural heritage and archaeology

NPS for Ports (January 2012)
- Paragraph 3.3.3

National Planning Policy Framework (February 2019)
- Chapter 16: Conserving and enhancing the historic environment

Dartford Core Strategy (September 2011)
- Policy CS 6: Thames Waterfront

Dartford Development Policies Plan (July 2017)
- Policy DP2: Good Design in Dartford
- Policy DP12: Historic Environment Strategy
- Policy DP13: Designated Heritage Assets

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS20: Heritage and the Historic Environment

Gravesham Local Plan First Review (Saved Policies) (November 1994)
- Policy TC2: Listed Buildings
- Policy TC7: Other Archaeological Sites

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSTP24: Heritage Assets and the Historic Environment

Ebbsfleet Implementation Framework (2017)

- Page 31, 36, 38, 41 & 89

Archaeology

8.313 An *Archaeological Desk-based Assessment* (document reference 6.2.13.7) is submitted with the application, in accordance with the NPPF. In deploying best practice and the use of multiple sources, it established a Study Area around each of the Kent and Essex Project Sites extending approximately 1 km from the boundaries for the consideration of archaeological remains. The marine Study Area comprises the Mean High Water (MHW) area of the River Thames, from the western-most boundary of the principal Study Area to the eastern-most boundary.

8.314 The *Archaeological Desk-based Assessment* was, however, also informed by numerous site visits, completed during both the preparation of an earlier 2015 desk-based assessment and, more recently again in 2020 following the inclusion of the Essex Project Site. The aim of the visits was to assess the general aspect, character, condition and setting of the Project Site and to identify any prior impacts not evident from secondary sources. The site visits also sought to ascertain if the Project Site contained any previously unidentified features of archaeological, architectural or historic interest.

Project Site

8.315 Baseline assessments, together with consultation feedback from statutory authorities, indicates that the Kent Project Site does contain archaeological remains which can be considered to be of international importance, specifically those relating to the Palaeolithic period. The Kent Project Site also contains a wide variety of heritage assets and sites dating to the prehistoric, Romano-British and Industrial periods.

8.316 Three Scheduled Monuments have been identified as falling within the Order Limits of the Kent Project Site while no archaeological designated heritage assets were identified within the Essex Project Site. These are identified in Table 8-3.

Table 8-3: Scheduled Monuments within the Project Site

Name	Location
Palaeolithic Sites near Bakers Hole (List Entry 1003557)	Located within the central corridor of the Kent Project Site and comprises two Scheduled areas. This area is also designated as a Site of Special Scientific Interest (SSSI) for its archaeological and geological value.
Neolithic Sites near Ebbsfleet (List Entry 1004206)	Located within the central corridor of the Kent Project Site near to Ebbsfleet International Station and comprises two Scheduled areas, the western of which lies within the Kent Project Site, the eastern area

	lies outside DCO Order Limits, 85m to the east at its closest point.
Springhead Roman Site (List Entry 1005140)	Located partially within the southern extent of the Kent Project Site adjacent to the A2. This comprises two scheduled areas adjacent to one another.

Study Area

8.317 Within the 1 km Study Area, six Scheduled Monuments were identified, three each on the Kent Project Site and Essex Project Site. These are identified in Table 8-4.

Table 8-4: Scheduled Monuments within the 1 km Study Area

Name	**Location**
Roman enclosure SE of Vagniacis (List Entry 1004226)	Located 140m to the south of the Kent Project Site
Aspdin's Kiln (List Entry 1004227)	Located 420m to the east of the Kent Project Site
Medieval Woodland Boundary in Darenth Wood (List Entry 1013378)	Located adjacent to the western boundary of the Kent Project Site, close to the A2(T)
Tilbury Fort (List Entry 1021092)	Located 90m to the east of the Essex Project Site
Gravesend Blockhouse (List Entry 1005120)	Located 650m to the south east of the Essex Project Site
New Tavern Fort, Gravesend, including Milton Chantry (List Entry 1013658)	Located 880m to the south east of the Essex Project Site

Commentary

8.318 The *Archaeological Desk-based Assessment* notes a very large number of previous studies have been undertaken within the Kent Project Site given its interest. The *Archaeological Desk-based Assessment* concludes the Project Site lies within an archaeologically rich landscape and therefore a large number of recorded remains have been discovered within the Kent Project Site and the wider Study Area as part of these previous studies.

8.319 It recognises that the River Ebbsfleet has been a key factor in the settlement pattern and use of the area since the earliest time, providing fresh water with higher drier ground close by, woodland for hunting and later fuel and a navigable routeway to the River Thames. The survival of archaeological remains within the Kent Project Site is varied, ranging from no potential due to extensive quarrying activities and past industrial activities across the Swanscombe Peninsula and very high potential due to scheduling and preservation in situ, for example the Baker's Hole SSSI.

8.320 The potential for the recovery of remains is considered to be high for Palaeolithic, Neolithic, Iron Age, Romano-British, Anglo-Saxon and modern periods across the Kent Project Site.

8.321 The Swanscombe Peninsula is expected to reveal remains dating to the prehistoric, postmedieval, 19th century, modern and palaeoenvironmental remains however it is noted these deposits may be located at depth as parts of the Swanscombe Peninsula have shown deep deposits of made ground. Palaeoenvironmental remains are also known to exist within the eastern part of the Kent Project Site, within the Ebbsfleet Valley. Generally, a low potential is expected for remains of medieval and post-medieval date across the Kent Project Site.

8.322 Tilbury is considered to be the typical site for palaeoenvironmental and relative sea level studies evidencing the environmental history of the River Thames and as such there is expected to be a high potential for palaeoenvironmental remains to exist at depth within the Essex Project Site. The Essex Project Site has been subject to previous development relating to the Port of Tilbury and as such the survival of archaeological features could have been affected by these activities. The *Archaeological Desk-based Assessment* concludes there is generally a low potential for archaeological remains up to the post-medieval period as it is likely that this area remained marshland apart from a small ferry to Gravesend from the 14th century, however, there has been a suggestion of a roman road in the area some finds of prehistoric date have been found close to the Essex Project Site.

Conclusion

8.323 The archaeological characterisation of the Project Site has identified areas of higher and lower potential for archaeological remains used to inform the impact assessment to predict potential effects to the archaeological resource within Chapter 14: *Cultural heritage and archaeology* of the ES (document reference 6.1.14). The archaeological characterisation has also helped inform the need for further archaeological evaluation or assessment and develop a mitigation strategy, in consultation with the statutory authorities.

Built heritage

8.324 A *Built Heritage Statement* (document reference 6.2.14.2) accompanies the application. The document has been prepared in compliance with the NPPF and Historic England guidance, to identify and provide a description of the significance and setting of built heritage assets within the Project Site and the surrounding area, the contribution of setting to their significance, and the likely effects of the development on their significance.

Project Site

8.325 The *Built Heritage Statement* identifies that the Project Site contains four listed buildings. These are summarised in Table 8-5.

Table 8-5: Listed buildings within the Project Site

Name	Grade	Location
Riverside Station, including floating landing stage	Grade II*	Located in the southern part of the Essex Project Site
Boundary Stone, Ingress Park, Lovers Lane	Grade II	Located on the western boundary of the Kent Project Site
Garden Bridge, Ingress Abbey	Grade II	Located on the western boundary of the Kent Project Site
Swanscombe Cutting Footbridge Crossing A2 East of A296 Junction	Grade II	Located within the southern part of the Kent Project Site

Study Area

8.326 An initial Study Area of 5 km was used as a starting point for assessment, informed by the Zone of Theoretical Visibility (ZTV) arising from the landscape and visual impact assessment undertaken as part of Chapter 11: *Landscape and visual effects* of the ES (document reference 6.1.11). However, this was subsequently refined during research and the site visit to a detailed 1 km search radius from the Order Limits. Where heritage assets beyond the 1 km Study Area are intervisible with the Project Site, or have a demonstrable historic, thematic, or spatial association with the Site, they were however included within the assessment.

8.327 Within the 1 km Study Area there are a large number of listed buildings, including two Grade I Listed Buildings; 12 Grade II* Listed Buildings; and 117 Grade II Listed Buildings. In addition, there are five Scheduled Monuments, of which four are considered to comprise built heritage assets. The majority of those designated built heritage assets are situated within one of the 10 conservation areas within the 1 km Study Area. The *Built Heritage Statement* notes that the vast majority of these heritage assets will not be affected in any way by the Proposed Development as the Project Site was found to not form a meaningful part of their settings, nor to contribute to their significance as a part of their setting, and as the Project Site is sufficiently well removed and screened from them, the Proposed Development will not impact upon their significance through a change in setting.

8.328 A total of 19 assets, or groups of assets, beyond the Project Site were considered in greater detail, falling outside the Project Site but were assessed as the Proposed Development has the potential to affect a number of designated built heritage assets within the Study Area as a result of a change within their setting. Their selection was also informed by consultation responses to the EIA Screening Opinion.

8.329 There are no World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within the 1 km Study Area.

8.330 A number of non-designated heritage assets, including a number of former industrial buildings, former industrial dock structures, late 19th-century residence and a mid-19th century public house, were also identified and assessed.

Significance and impact

8.331 The *Built Heritage Statement* assesses the significance of identified assets before considering the impact of the Proposed Development upon them. It concludes that, notwithstanding the scale and prominence of the Proposed Development, the principle of the Proposed Development is acceptable with impacts upon the historic built environment, including those assets with the highest significance within the surrounding area, will be negligible. This conclusion is reached in the document given the highly evolved and industrialised nature of the landscape, and the insular nature of many of the identified heritage assets.

8.332 The *Built Heritage Statement* does, however, specifically identify impacts upon a number of key assets, principally at the Essex Project Site. It considers that the development is likely to result in the enhancement of the Grade II* Riverside Station and Landing Stage which are currently under-utilised. The Proposed Development offers the opportunity to ensure the re-use and long-term survival of these structures. Secondary benefits are identified for the nearby Tilbury Fort and World's End Inn.

8.333 The *Built Heritage Statement* suggests that two of the identified non-designated heritage assets, Bell Wharf and White's Jetty, will be enhanced by the Proposed Development through a scheme or repair, restoration, and reuse. The document considers the demolition of several non-designated assets of low significance will result in their complete loss; however, the significance of these assets is considered limited. The document recommends appropriate mitigation for their loss through a scheme of historic building recording.

8.334 Indirect effects to the significance of designated built heritage assets are expected to result from predominantly the operational phase of the development. Effects during the construction phase, generally arise from the presence of flashing lights on moving vehicles, dust, and the presence of cranes and would be temporary and reversible after the construction phase has ended. These effects are not considered to affect the significance of heritage assets.

Conclusion

8.335 The *Built Heritage Statement* concludes the Proposed Development will result in no harm to the significance of any designated heritage assets, either within the Project Site or the surrounding area.

8.336 A Built Heritage Assessment is recommended for the Riverside Station (Grade II* listed) to assess the specifics of the proposed alterations as details of these designs not available at masterplanning stage become available. This will allow the design of the alterations to be informed by the assessment to avoid harm to heritage significance where possible.

Mitigation and management

8.337 A *Historic Environment Framework* (HEF) (document reference 6.2.14.9) accompanies the application. The purpose of the document is to outline a framework for the management

of the archaeological and heritage assets found across the Project Site and identify proposals for further assessment/evaluation and mitigation for the Proposed Development, where harm is unavoidable. The HEF has been informed by past and ongoing discussions with statutory consultees and stakeholders, including Historic England, Natural England and Kent County Council.

8.338 The document also identifies initial proposals for heritage interpretation and public engagement to enhance public value and benefit from engagement with the historic environment, to contribute to placemaking and to provide information on the special archaeological and historic interest of the area. Written Schemes of Investigation (WSI) will be prepared, informed by the document, and will be agreed in consultation with the relevant statutory consultees prior to the Proposed Development taking place.

8.339 The HEF notes that there has been an archaeological interest in the Ebbsfleet area for over 100 years as a result of extensive quarrying of the area. A large number of investigations were undertaken within the Kent Project Site in advance of the construction of High Speed 1 (HS1). Other investigations have also been undertaken on the Swanscombe Peninsula.

8.340 At the Essex Project Site, immediately adjacent is the area for the Tilbury2 development and an archaeological evaluation was undertaken in 2019. No archaeological finds or features were discovered.

8.341 Due to the complex nature of the known and potential archaeological remains across the Project Site, the HEF notes a variety of techniques for evaluation and mitigation will be required. The assessment of archaeological remains is a staged process, with the results of initial stages of evaluation used to inform further assessment and mitigation, or alternatively, reduction in assessment where no interest is found. The HEF sets out the general methodology as to how investigations will be undertaken.

8.342 The HEF also identifies evaluation strategies for:

- Evaluation Strategy for Palaeolithic Remains;
- Evaluation Strategy for Geoarchaeological Remains;
- Evaluation Strategy for Post-Palaeolithic Archaeology; and
- Evaluation Strategy for Marine and Inter-tidal Archaeology.

8.343 The HEF notes preservation in situ and preservation by record through archaeological investigation are the two main options by which impacts to archaeological remains can be mitigated. Preservation in situ is the conservation of an archaeological asset in its original location and is the preferred method of conservation for assets of national or international significance. Preservation by record through archaeological investigation is the process by which archaeological remains are excavated, recorded and published to offset the construction effects and to disseminate the information to the public.

8.344 As noted above, a Built Heritage Assessment is recommended for the Riverside Station to inform the progression of detailed design for this asset.

Conclusion

8.345 Extensive efforts have been undertaken to establish a comprehensive understanding of the baseline position of the archaeological and built heritage matters.

8.346 The *Built Heritage Statement* (document reference 6.2.14.2) concludes the Proposed Development will result in no harm to the significance of any designated heritage assets, either within the Project Site or the surrounding area. As noted above, a Built Heritage Assessment is recommended for the Riverside Station building to inform the progression of detailed design for this asset.

8.347 Owing to the significant archaeological interest associated with the Kent Project Site, field survey work is required to be undertaken. The *Historic Environment Framework* (HEF) (document reference 6.2.14.9) provides a framework for the management of the archaeological and heritage resource of the Project Site and proposals for further assessment/evaluation and mitigation for the development proposals, where harm is unavoidable. This will be progressed with statutory consultees following the submission of the DCO application.

8.348 In accordance with Paragraph 195 of the NPPF, the very limited harm identified is off set by the significant public benefit of the Proposed Development which demonstrably outweigh the harm and loss of significance. The same conclusions are reached when considering the Proposed Development at a local level against relevant development plan policies. Identified mitigation measures to be agreed with statutory consultees in respect of archaeological interests will ensure an appropriate form of development.

SUSTAINABILITY AND ENERGY

Overview

8.349 The NPPF encourages sustainability through its overarching presumption in favour of sustainable development and a concentration on the economic, social and environmental objectives to be achieved in this goal.

8.350 At a local level, development plan documents repeat the mantra of the NPPF in promoting a presumption in favour of sustainable development. For example, this is contained in Policy DP1: Dartford's Presumption in Favour of Sustainable Development of the Dartford Development Policies Plan (July 2017) and Policy CS01: Sustainable Development of the Gravesham Local Plan Core Strategy (September 2014).

8.351 Sustainable development is also referenced within site specific policies, including Policy CS6: Thames Waterfront of the Dartford Core Strategy (September 2011) and with reference to economic, social and environmental improvements within Policy CS03:

Northfleet Embankment and Swanscombe Peninsula East Opportunity Area of the Gravesham Local Plan Core Strategy (September 2014).

Figure 8-8: Key planning policy relating to sustainability and energy

National Planning Policy Framework (February 2019)
- Chapter 2: Achieving sustainable development

Dartford Core Strategy (September 2011)
- Policy CS 23: Minimising Carbon Emissions

Dartford Development Policies Plan (July 2017)
- Policy DP11: Sustainable Technology and Construction

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS01: Sustainable Development
- Policy CS18: Climate Change

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD12: Sustainable Buildings
- Policy CSTP26: Renewable or Low-Carbon Energy Generation
- Policy PMD13: Decentralised, Renewable and Low Carbon Energy Generation
- Policy PMD14: Carbon Neutral Development

Ebbsfleet Implementation Framework (2017)
- Throughout

Sustainability

8.352 An *Outline Sustainability Strategy* (document reference 7.7) accompanies the application. The document seeks to demonstrate how LRCH's vision to create a world-class entertainment resort founded on sustainable and low carbon principles will be implemented, setting out the London Resort's commitments and aspirations within the sustainability policy context.

8.353 The *Outline Sustainability Strategy* seeks to set out the commitments and aspirations to substantiate the sustainability vision through eight themes which draw from local planning policy and industry best practice:

- Net zero carbon in terms of operational energy use;
- Resource efficiency;
- Sustainable water cycle;

- Climate resilience;
- Sustainable connectivity;
- Sustainable land use and biodiversity;
- Health and wellbeing; and
- Social value.

8.354 The *Outline Sustainability Strategy* recognises the unique opportunity of the London Resort to be a catalyst for the regeneration of the Swanscombe Peninsula and the wider area, as has been discussed and recognised in earlier sections of this Statement.

8.355 Owing to the masterplanning and parameter-led approach taken within the DCO application, many of the detailed ways in which sustainability will be taken forward into the London Resort are not possible to demonstrate at this stage, though clearly commitments can be made. In respect of the built form, however, the *Design Code* (document reference 7.2) contains an environmental brief seeking to ensure opportunities to 'build in' sustainability is delivered at a later stage of design.

Energy

8.356 An *Energy Statement* (document reference 6.2.20.3) accompanies the application. The document identifies how sustainability and low carbon principles are at the heart of the London Resort's vision and is the basis for the overarching energy strategy objective of targeting net zero carbon operationally.

8.357 A key objective of the *Energy Statement* sought by LRCH was to assess a range of heat pump configurations for the London Resort including decentralised/building level heat pumps and more centralised, large scale heat pumps as part of a site-wide district heating system. The *Energy Statement* identifies that a centralised Air Source Heat Pump (ASHP) with district cooling configuration has been selected as the preferred heating and cooling strategy across the London Resort.

8.358 Whereas similar scale ASHP systems are operational in Denmark and Sweden, it should be noted that at this scale, the centralised ASHP configuration is thought to represent a 'first of a kind' energy system for the UK. As such, the strategy being deployed provides the London Resort with a unique opportunity to demonstrate an innovative technology that is considered integral to the decarbonisation of heat and work to delivery LRCH's sustainability vision.

8.359 The use of a heat pump-based system to meet more than 90% of the London Resort's heating demands will lead to significant carbon reductions when compared to a scenario where only gas boilers are used for heating.

8.360 Based on this performance, the current strategy for heating allows comfortable compliance with the Part L of the Building Regulations 2013 and a minimum carbon

reduction target of 35% (compared with the Part L 2013 baseline scenario). The *Energy Statement* recommends the proposed energy strategy is subject to review alongside any progression and more stringent building regulation requirements.

Conclusion

8.361 LRCH is seeking to develop a world-class, sustainable, next generation entertainment resort. The application is submitted in a parameter-led approach, therefore providing for flexibility in the delivery of the Proposed Development. However, the accompanying *Outline Sustainability Strategy* and *Energy Statement* have identified the principles in which the London Resort will evolve, ensuring an appropriate form of development that meets LRCH's vision.

8.362 The Proposed Development is therefore considered to be in accordance with the thrust of the policy basis identified within the NPPF and its ambition towards delivering sustainable development, which is also reflected at a local level through development plan policies. The delivery of sustainability can be ensured at a detailed design stage of delivery through the appropriate use of requirements upon the making of any DCO.

UTILITIES

Overview

8.363 At a high level, the NPPF seeks to ensure appropriate delivery of infrastructure by recognising future needs through the plan-making process. In respect of plan-making, paragraph 20 notes that strategic policies should make sufficient provision for

'b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)'

8.364 There is otherwise little detailed commentary on the provision of utility infrastructure, except at paragraph 112, the NPPF recognises the importance of *'high quality and reliable communications infrastructure'* for economic growth and social well-being.

8.365 At a local level, development plan policies in a general sense seek to ensure appropriate infrastructure is provided for within developments. Whilst a no-statutory document, at page 16, the EIF recognises that *'a significant barrier to delivery to date has been infrastructure'* noting that sites are *'constrained by the capacity of the transport and utility networks.'* The document indicates *'EDC must use public money wisely to ensure that development can be unlocked, through forward funding critical infrastructure such as utilities and innovative public transport solutions'.* This is discussed further at pages 80-81 of the document.

Figure 8-9: Key planning policy relating to utilities

National Planning Policy Framework (February 2019)
- Paragraph 20 & 112

Dartford Core Strategy (September 2011)
- Policy CS 23: Minimising Carbon Emissions
- Policy CS 26: Delivery and Implementation

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSSP3: Sustainable Infrastructure
- Policy CSTP13: Emergency Services and Utilities

Ebbsfleet Implementation Framework (2017)
- Pages 16, 80-81 & 126

Assessment

8.366 A *Utilities Statement* (document reference 7.6) accompanies the application and identifies the existing utility infrastructure within the locality of the Project Site. A review of the existing utilities infrastructure located across the Project Site has been undertaken using desktop surveys and information provided from existing utility suppliers. However, the existing utility connections will be fully investigated as part of the detailed design stage to develop a schedule of utility diversions and disconnections required to enable construction of the Proposed Development. As identified within the *Utilities Statement* (document reference 7.6), all works will be undertaken in accordance with the relevant regulations and guidelines and will be subject to approval by the owners of the existing utility assets.

8.367 The *Utilities Statement* identifies strategies for serving the Project Site with energy, water, wastewater and digital infrastructure. These are briefly summarised below.

Energy

8.368 The document notes that it is intended to provide power to the Kent Project Site via the Ebbsfleet 132kV/33kV sub-station and the Essex Project Site via a new 11kV sub-station that will be constructed within the Order Limits within the vicinity of Fort Road. A Low-Pressure gas connection will be provided to the Kent Project Site for top-up heat generation within the centralised plant. No gas connection is proposed to service the Essex Project Site. The demand for gas is considered to be limited, with electricity used for cooking.

Water

8.369 Potable water demands for the Kent Project Site exceed capacity within the existing network. Discussions have been held with Thames Water and will continue to refine water demands as the design develops, however it is currently anticipated that Thames Water will need to source additional supplies of water and reinforce local water treatment and supply networks to cater for the demands of the London Resort. In respect of the Essex Project Site, Essex and Suffolk Water has confirmed connections can be made into an existing water main on an adjacent road and that sufficient capacity exists.

Wastewater

8.370 Southern Water has confirmed that their planned infrastructure upgrades will not provide sufficient treatment capacity until 2030 for the Kent Project Site. As a result, LRCH is proposing to construct an on-site wastewater treatment facility. The intention is to recycle as much of the treated wastewater as possible for non-potable uses (including irrigation) but the balance will require discharge into the River Thames, subject to regulatory approvals from the necessary bodies, such as the Environment Agency and Marine Management Organisation. Essex and Suffolk Water has confirmed there are no capacity constraints for the Essex Project Site.

Digital infrastructure

8.371 The digital infrastructure strategy will develop fixed fibre, cellular and Wi-Fi networks to support the operation of the London Resort throughout its life-time. There are current deficiencies across the Kent Project Site owing to the nature of its current use and limited population and activities.

Conclusion

8.372 At this stage, investigations have considered the relative infrastructure and capacities available within utility connections, principally in respect of energy, water, wastewater and digital infrastructure. The investigations have identified differences in available capacities and infrastructure between the Kent Project Site and the Essex Project Site. Where capacity constraints have been identified, steps to alleviate these have been identified, and in many cases in principle agreements reached, to ensure the delivery of sufficient infrastructure to serve the Proposed Development in the future to the maturity of the London Resort in 2038.

TRANSPORT

Overview

8.373 The NPS for National Networks (December 2014) and NPS for Ports (January 2012) are considered relevant given the importance and emphasis of transport and port development within them respectively. A brief overview of the NPS is provided in Chapter six of this Statement.

8.374 The NPPF seeks to ensure transport issues are considered from the earliest stages of plan-making and in development proposals to ensure potential effects are addressed and opportunities are identified and pursued. Chapter 9 as a whole seeks to promote the delivery of sustainable transport solutions. The NPPF states, at paragraph 109, that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

8.375 At a local level, development plan policies relating to transport are numerous and lengthy. In summary, Policy CS15: Managing Transport Demand and Policy CS16: Transport Investment of the Dartford Core Strategy (September 2011) seek to reduce the need to travel, specifically by car and address pressures on the transport network, including developer contributions. In a more site-specific sense, Policy CS6: Thames Waterfront encourages development across the Swanscombe Peninsula that utilises its proximity to Ebbsfleet International Station. At a more granular level, Dartford Development Policies Plan (July 2017) policies Policy DP3: Transport Impacts of Development and Policy DP4: Transport Access and Design seek to ensure development proposals minimise and manage arising transport effects and are designed to promote active travel and the use of public transport and ensuring vehicular access arrangements meet required standards.

8.376 Similar objectives are sought through the Gravesham Local Plan Core Strategy (September 2014) Policy CS11: Transport and Policies T1-4: Impact of Development on Highway Network and Policy T5: Access to the Identified Highway Network of the Gravesham Local Plan First Review (Saved Policies) (November 1994). Again, at site-specific level, Policy CS06: Ebbsfleet (Gravesham) Opportunity Area promotes development that capitalises upon a strong connection to Ebbsfleet International Station.

8.377 Within Thurrock, Policy CSTP14: Transport in the Thurrock Urban Area: Purfleet to Tilbury sets out how the Council intends to deliver at least a 10% reduction in car traffic from forecast 2026 levels, while Policy CSTP15: Transport in Greater Thurrock, Policy CSTP16: National and Regional Transport Networks and Policy CSTP17: Strategic Freight Movement and Access to Ports seek to promote how the Council intends to improve transport accessibility and regional transport networks across Thurrock.

8.378 Matters relating to transport infrastructure, connectivity and sustainability are provided throughout the EIF.

Figure 8-10: Key planning policy relating to transport

National Planning Policy Framework (February 2019)
- Chapter 9: Promoting sustainable transport

Dartford Core Strategy (September 2011)
- Policy CS6: Thames Waterfront
- Policy CS 15: Managing Transport Demand

- Policy CS 16: Transport Investment

Dartford Development Policies Plan (July 2017)
- Policy DP3: Transport Impacts of Development
- Policy DP4: Transport Access and Design

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS06: Ebbsfleet (Gravesham) Opportunity Area
- Policy CS11: Transport

Gravesham Local Plan First Review (Saved Policies) (November 1994)
- Policies T1-T4: Impact of Development on Highway Network

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSTP14: Transport in the Thurrock Urban Area: Purfleet to Tilbury
- Policy CSTP15: Transport in Greater Thurrock
- Policy CSTP16: National and Regional Transport Networks
- Policy CSTP17: Strategic Freight Movement and Access to Ports

Ebbsfleet Implementation Framework (2017)
- Throughout

Assessment

8.379 The success of the London Resort is dependent upon high visitor numbers and visitor enjoyment. It is estimated that the London Resort could attract approximately 12.5m visitors per year at maturity (2038) onwards. With these visitors coming from local, regional, national and international origins, this requires a robust and effective transport strategy is adopted that is as efficient as possible and minimises adverse effects upon the existing transport infrastructure.

8.380 A detailed *Transport Assessment* (document reference 6.2.9.1) accompanies this application as an appendix to Chapter 9: *Land transport* of the ES (document reference 6.1.9). The *Transport Assessment* provides significant levels of technical information in relation to the transport strategy, assessment and mitigation for the London Resort.

8.381 The document presents the existing conditions of the Project Site, the Proposed Development and a robust methodology that has been prepared in order to determine the likely peak hour multi-modal trip generation and its distribution, for visitors and staff, and the resulting travel demand based on forecast annual and daily attendance. Appended to the *Transport Assessment* is a considerable number of supporting strategies, reports and mitigation documents. These documents must be read as a collective whole to gain a full appreciation of the transport strategy, assessment, impacts and mitigation being proposed to ensure an appropriate and effective strategy for the London Resort.

Overview

8.382 Both Chapter 2 of the *Transport Assessment* (document reference 6.2.9.1) and Chapter 9: *Land transport* of the ES (document reference 6.1.9) provide details of the extensive consultation that has been undertaken in respect of transport related matters of the London Resort from 2014 onwards, including the two EIA Scoping exercises (2014 and 2020). Discussions have been held with a large number of organisations in respect of transport-related matters, including, but not limited to DBC, GBC, KCC (including Fastrack), EDC, TC, Highways England, Port of London Authority, High Speed 1, Thames Clippers, Network Rail and Port of Tilbury London Limited.

8.383 Transport matters associated with the London Resort are important, given the nature of the Proposed Development, the Project Site's location and context and the opportunities and constraints presented, both existing and in the future. The proposed transport approach has considered the sustainability aspirations of the London Resort and an objective to reduce and limit its impact to the local and wider communities wherever possible.

Existing conditions

8.384 As detailed in Chapter three of this Statement and Chapter 4: *Project development and alternatives* of the ES (document reference 6.1.4), the Project Site was selected in part given its strong existing transport links and infrastructure including accessibility to European cities, transport and service infrastructure.

8.385 The *Transport Assessment* (document reference 6.2.9.1) provides a thorough review of existing conditions in its Chapter 4. It notes that the Kent Project Site is highly accessible to the Strategic Road Network (SRN), including the A2(T), M2, M25 and the Queen Elizabeth II Dartford Crossing. The *Transport Assessment* also recognises the connectivity to the north within the Essex Project Site and the ability to capitalise upon the Port of Tilbury, as a significant change in the Proposed Development as a result of a review of the Business Plan and previous consultation feedback.

8.386 The proximity of the Proposed Development to available rail services, a location adjacent to the River Thames and adjacent Fastrack bus services provides a unique opportunity for the accessibility of the London Resort by sustainable modes. The Project Site's relationship with existing public transport infrastructure, most notably Ebbsfleet International Station, was a significant influence. Moreover, the Project Site's location against the River Thames which could be utilised for both construction and operational purposes was also a considerable factor, providing a key option for the transportation of visitors, staff and goods during both construction and operation. Paragraph 3.3.1 of the NPS for Ports (January 2012) recognises the importance of ports for long-term economic growth and prosperity. Moreover, at paragraph 3.3.5, the Government wishes to see port developments support sustainable transport options by offering more efficient transport links. The inclusion of the Port of Tilbury therefore introduces efficient transport links by avoiding the need for private vehicles visiting the London Resort from the north to continue their journey to the south of the River Thames, thus avoiding unnecessary

journey length. The accessibility of the Project Site therefore provides a unique opportunity for the delivery of a global entertainment resort.

8.387 Due consideration has been given to consented or proposed schemes, such as Tilbury2 and the Lower Thames Crossing (LTC), which will alter the existing conditions prior to and alongside the proposed construction and operational timeline for the London Resort. In these specific examples, construction has commenced for Tilbury2 but following a submission to PINS in October 2020, the LTC application was withdrawn prior to a decision being issued on the acceptance stage.

Trip generation, trip distribution, mode share

8.388 Details surrounding trip generation, trip distribution and mode share have been discussed at length with statutory consultees and other stakeholders. The principles and contents of these were shared with the main transport stakeholders in the form of 'technical notes' in June 2020 to allow time for review, critique and feedback ahead of detailed transport work being undertaken. In many respects, the information and details contained within were updates of earlier technical notes prepared and discussed in 2017 during an earlier stage of the project.

8.389 Further details on each of these topics is provided in the subsequent paragraphs.

Trip generation

8.390 The London Resort will operate seasonally with the peak occurring during the traditional summer months, which is when staffing will also be highest.

8.391 The visitor demand for the London Resort was provided by industry experts which was subsequently translated into vehicle movements based on the robust mode share. As agreed with statutory consultees and stakeholders, given the seasonal variability of visitors at the London Resort, the assessment was based on the 85th percentile day in terms of visitor demand. This is a day occurring during the peak operating period in the summer months but would still be occurring during school term time (worst case).

8.392 The *Transport Assessment* considers a total two-way vehicle demand in the PM peak commuter peak from the London Resort is 876 in 2025, 1,181 in 2029 and 1,639 in 2038 on the 85th percentile day, accounting for both visitor and staff demand. The *Transport Assessment* used these development flows for the assessments.

8.393 Further details can be found in Technical Note (TN) 1: Trip generation at Appendix TA-M of the *Transport Assessment* (document reference 6.2.9.1).

Trip distribution

8.394 As noted within the *Transport Assessment*, a number of factors influence the methodology and model used to identify trip distribution. These include analysis of the visitor breakdown for domestic, European and International visitors, analysis of the likelihood of

an overnight stay based on home origin distance along with the availability of accommodation for such and the likely distribution on the day of travel.

8.395 A similar analysis was undertaken for staff trip distribution, informed by journey to work data and assessment of data derived from other amenities in England. Assessment suggests that staff may travel from slightly further afield than is typical of Swanscombe residents to work at the London Resort.

8.396 Further details can be found in TN2: Trip distribution at Appendix TA-N of the *Transport Assessment* (document reference 6.2.9.1).

Mode share

8.397 Mode share is an important consideration for the London Resort. The *Transport Assessment* notes that to calculate the likely mode shares expected for visitors and staff, a number of assessments have been undertaken, ranging from a worst case (in terms of high numbers of vehicles) to those that incorporate travel behaviour as well as other variables, such as cost and travel demand measures.

8.398 As noted within the Transport Assessment, base mode shares have been used in the modelling for capacity and highway impact assessments as it represents the worst case, and therefore highest demand expected from the Project Site. It assumes car parking capacity was utilised to its maximum. This approach largely ignores any existing travel choices available for non-London visitors and assumes that people will drive where possible, hence why this is expected to be the worst-case scenario. The Base mode shares are set out in TN3: Mode share at Appendix TA-O of the *Transport Assessment* (document reference 6.2.9.1).

8.399 TN4: Future Mobility at Appendix TA-P of the *Transport Assessment* (document reference 6.2.9.1) builds upon the work in TN3 but applies further assessment and analysis to look at the likely shift in mode that could occur to visitors and considers the future mobility and accessibility to public transport and active travel. The key modes included are private vehicles, non-public transport modes, river, rail, bus, and active modes.

8.400 A review of the potential and aspirational mode shares that could occur following the implementation of the Travel Demand Management Plan (Appendix TA-C to the *Transport Assessment*) has been undertaken. This provides a series of measures for both visitors and staff alike, which will have the goal to reduce reliance on private vehicle use where possible.

Highway modelling methodology

8.401 Section 2.5 and Chapter 9 of the *Transport Assessment* (document reference 6.2.9.1) provides commentary and background to the modelling approach adopted following extensive dialogue with a number of statutory consultees, including Highways England and KCC. The *Transport Assessment* notes it was agreed with stakeholders that a combined approach of local junction modelling, microsimulation modelling and a spreadsheet based

strategic model derived from existing strategic traffic models would be an appropriate approach for assessing the London Resort impacts.

8.402 Analysis undertaken has been combined to determine the full hourly arrival and departure distribution profile, at a local authority level, for the 85th percentile day in each assessment year. Online journey planning tools were used to determine origin-destination routes to/from the London Resort and input the resulting trip generation and distribution, into traffic flow diagrams.

8.403 The methodology used inputs from a variety of sources to develop a spreadsheet-based model to determine the local and strategic highway impacts of the proposed London Resort visitor and staff demand. The spreadsheet model has been subsequently used to provide air quality and noise outputs for inform these aspects of the Environmental Impact Assessment (EIA).

8.404 The Transport Assessment presents the impacts of the Proposed Development on the local transport networks through the assessment of visitor and staff demand during the traditional AM and PM peaks at four key phases, being the peak construction year (2023); first full year of Gate One being open (2025), Gate Two opening (2029) and when the London Resort is forecast to reach maturity (2038).

Walking and cycling strategy

8.405 Existing walking and cycling conditions around the Project Site were assessed to identify barriers, opportunities and recommendations for inclusion in the transport strategy and review the active and sustainable accessibility of the Kent and Essex Project Sites.

8.406 This active travel strategy highlights the barriers to and opportunities for active travel, identified through the site audits and data analysis, to provide a joined up cohesive route for staff and visitors accessing The London Resort. A number of key upgrades are identified, as discussed in Chapter 10 of the *Transport Assessment* (document reference 6.2.9.1)

8.407 It is proposed that the crossing facilities at the junction of London Road / High Street / Pilgrims Road are upgraded for pedestrians and cyclists accessing the main active travel entrance of the London Resort. West of the Kent Project Site, it is proposed that two alternative routes to London Road will be proposed with obligation from LRCH to help fund improvements such an upgrading of routes, signage, wayfinding, lighting and security, with an access provided in the vicinity of Titman Avenue and Manor Way, together with a route from the south of A226 London Road serving the staff accommodation.

8.408 East of the Kent Project Site, Thames Way has been identified for improvement with the incorporation of a footway-level cycle track along the north-bound carriageway which would connect residential areas south east of the London Resort to Ebbsfleet International Station and the dedicated off-road active travel route between the station and the main interchange plaza.

8.409 At the Essex Project Site, it is proposed that the existing advisory cycle lane on Montreal Road is improved with additional implementation of further advisory cycle lanes on Dock Road and Calcutta to support trips from visitors and staff living in Tilbury or arriving by rail into Tilbury Town station to cycle to the Ride and Glide facilities.

Public transport strategy

8.410 The Transport Assessment recognises that public transport must play a major role in facilitating the movement of both visitors and staff to and from the London Resort as a key element in ensuring sustainability and addressing future potential traffic congestion issues in the area. A public transport strategy has been developed to facilitate the expected demand associated with visitors and staff to the proposed London Resort.

8.411 The Public Transport strategy seeks to ensure that seamless and co-ordinated connectivity is achieved, as well as addressing capacity requirements and, where appropriate, the introduction of new and/or enhanced services.

8.412 From the perspective of passenger rail services, the franchise operator is currently Southeastern (SE), whose franchise is responsible for both local train services in the Kent Thameside area (including the North Kent Line) and domestic high-speed trains on High Speed One (HS1). Discussions are on-going with SE, HS1 and Network Rail.

8.413 A dedicated high frequency People Mover system will be provided to transfer visitors from Ebbsfleet International Station to the London Resort using a new road-based connection, which will not be open for public usage. The development of the People Mover acts as a further incentive to encourage the use of Ebbsfleet International Station and make its choice as user-friendly and convenient as possible.

8.414 In relation to bus-based public transport, Kent County Council already has proposals for the continued development of Fastrack (Bus Rapid Transit service), and negotiations are on-going with regard to future routeing and required capacity, including diverting one of the services to operate via the dedicated link between Ebbsfleet International Station and the main entrance to the London Resort, as well as providing a direct connection between the London Resort and Greenhithe Station. In accordance with part j) of Policy CS6: Thames Waterfront, proposals for integrating Fastrack have been included as part of proposals for the London Resort and should therefore be supported.

8.415 Additionally, there will be a key role for the network of local bus services, primarily operated by Arriva, which is being developed, in particular for the 480/490 services, which connect Dartford with Gravesend and the Gravesham area passing close to the main entrance to the London Resort. Other local bus services are being considered for enhancement in order to provide connections either to the London Resort itself or to Ebbsfleet International Station, where transfers to either the People Mover or to Fastrack are easily achieved.

8.416 For the Essex Project Site, it is envisaged that direct bus links will be provided from the surrounding areas of Gray with an improvement to the connection between Tilbury Town Station and Tilbury Ferry terminal.

8.417 It is considered that the 75-minute high-speed river service from central London to the London Resort will offer a sustainable alternative to private vehicle or rail trips for visitors originating from London, either as their home or tourists staying in hotels within London boroughs. The 'Park and Glide' service will provide a cross-river shuttle between Tilbury and the London Resort enabling the efficient transportation of visitors choosing to arrive at Tilbury Town station or utilise the car parking proposed at the Essex Project Site.

Parking strategy

8.418 The Proposed Development includes for up to 10,750 car parking spaces across the Project Site. Of these spaces, 10,000 are dedicated to visitors, with the provision of up to 7,500 at the Kent Project Site and 2,500 at the Essex Project Site. In addition, 250 VIP parking spaces are provided under the main visitor plaza and 500 staff parking spaces within the back of house. It is important to note that at opening in 2024, the Proposed Development will have approximately 5,000 visitor spaces which will increase in line with uptake in visitor numbers. Car parking and coach parking numbers form part of the DCO application and therefore are a fixed number with no more than 10,250 visitor spaces and no more than 200 coach parking bays will be permitted as part of the Proposed Development. Additionally, a multi-storey car park may require to be constructed to the east of Ebbsfleet International Station to accommodate 1,200 car parking spaces that will either be temporarily or permanently displaced by the construction of the London Resort Access Road.

8.419 As part of the parking strategy, a review of both on-site and off-site parking implications has been undertaken. A monitoring process will be established to consider off-site parking and identify whether any changes in demand arise which may be attributable to the London Resort. In the event that this is shown to occur measures will be implemented to prevent this such as the introduction of a phased Controlled Parking Zone (CPZ).

Development impact

8.420 The implementation of the dedicated Resort Access Road and proposed access junction improvements minimise the impacts that the London Resort demand has on the highway network and improves the journey time and queueing for vehicles accessing Ebbsfleet via the A2(T) eastbound on and off slips.

8.421 The individual junction assessments of the four main junctions forecast a negligible impact at three of the junctions. It is possible there may be works at the Asda Roundabout.

8.422 The merge diverge assessments along the key corridors of concern forecast that the development flows from the London Resort have little or no material impact on the provision provided for the majority of assessments.

8.423 It is important to recognise that given the existing industrial site uses, which will make way for the Proposed Development, there will be an adjustment to identify the actual net effects.

Travel Demand Management Plan

8.424 The *Transport Assessment* includes a Travel Demand Management Plan (TDMP) as an appendix. The TDMP outlines a comprehensive and flexible approach to managing the travel demands of key audiences that will travel to and from the London Resort.

8.425 The TDMP focuses on demand-side measures, designed to help optimise transport and mobility networks by influencing how and when people travel to and from the London Resort. The measures set out in the TDMP are drawn from a review of international best practice and considering the context and wider transport evidence base for the London Resort. This includes use of marketing communications, ticketing options, London Resort operations, journey planning advice and measures to proactively manage car-based travel.

8.426 The TDMP measures are, for the most part, scalable in response to changing travel patterns and demands over time. This means as the TDMP is delivered there will be opportunities to shape the exact detail and scale of each measure as required, informed by monitoring data and feedback from site users. Specific measures that are proving particularly effective could then see further investment to scale up their application or embrace new and enhanced technologies or services that emerge over time. Similarly, measures which prove less effective or popular with London Resort visitors and employees can be scaled back or revised, informed by the evidence.

8.427 This represents an approach to TDMP planning that is Future Ready – whereby measures are identified at this stage ahead of the London Resort opening but in recognition of rapidly changing social and transport trends that may influence travel demands and behaviours in the future. The TDMP should retain flexibility to adapt and introduce new, presently unknown, measures that may provide highly effective in managing travel demands at a future point.

8.428 Travel patterns and transport impacts associated with the London Resort will naturally change over time and gathering a comprehensive and robust evidence base will be important for on-going decision-making and investment in supporting measures. The TDMP has set out indicative interim targets for visitors that will be reviewed over the implementation of the London Resort. The use of those targets in the analysis of parking demand has shown that measures and initiatives in place would have a positive benefit for retiming trips and encouraging modal shift away from private vehicle use.

Delivery and Servicing Plan

8.429 The aim of the Delivery and Servicing Plan is to enable safe freight activity to and from the London Resort as well as on-site. The document aims to minimise the impact of delivery and service movements on the nearby highway network by a range of measures including

design and operational efficiency, road trip reduction and waste management while also including a complaints and investigation strategy.

8.430 The location of the London Resort will allow for delivery and servicing to be undertaken by road and river; a consolidation unit will be acquired in the Port of Tilbury. This will allow for delivery and servicing to occur throughout the day, complementing road-based delivery and servicing which may have limitations and restrictions.

8.431 The routing strategy to the Kent and Essex Project Sites will be adopted to ensure that the HGVs follow an appropriate route that reduces any travel through sensitive areas and promotes the use of the strategic road network.

Conclusion

8.432 The existing conditions surrounding the Kent and Essex Project Site have been thoroughly reviewed to consider the current accessibility of the site by highway, public transport and active modes of transport. Site visits and observations have helped to determine current barriers to sustainable and active travel within the vicinity of the site and influenced the development of the Public Transport and Active Travel Strategy. A parking study revealed the key areas for consideration in the Off-Site Parking Plan, developed to address concerns of local residents about visitors or staff parking locally and walking to the London Resort.

8.433 Robust information has been supplied by industry experts and underpins the *Transport Assessment* (document reference 6.2.9.1) and the trip generation, trip distribution and mode shares for the 85th percentile day, in each of the assessment years have been determined using this analysis.

8.434 A worst-case private vehicle mode share, determined using a car park accumulation exercise, has been used to assess the impacts of the London Resort demand on the local and strategic highway network within the vicinity of the Kent and Essex Project Sites. The dedicated London Resort Access Road and improvements proposed at the A2 Ebbsfleet junction roundabouts mitigate impacts on journey times and queueing, not impacting the safety of the existing junction operation.

8.435 A Walking and Cycling (Active Travel) Strategy has been developed to outline proposed improvements to pedestrian and cyclist routes north, east, south and west of the London Resort and LRCH will seek to help fund improvements and upgrades to existing facilities in order to ensure provision of a cohesive and connected active travel network, in line with LTN 1/20 guidance. The strategy proposes improvements that will overcome some of the barriers to active travel that were identified through research, site audits and the PIA data. The dedicated off-road walking and cycling route between Ebbsfleet International Station, the London Resort and the jetty and upgrades to routes west of the Kent Project Site will help to overcome the barrier of London Road and further encourage the use of active travel as a mode of transport.

8.436 In order to determine suitable mitigation strategies for public transport, the potential effects on rail, bus and river have been assessed and presented within the *Transport*

Assessment. A comprehensive provision of additional bus service provisions or diversions is proposed to accommodate the transporting of people from rail stations or ferry terminals to the London Resort, in addition to benefitting staff or visitors who live locally.

8.437 To support the Active Travel Strategy and the Public Transport Strategy, a Travel Demand Management Plan (TDMP) has been developed to outline measures to influence how and when people will travel to/from the London Resort; the TDMP provides methods to encourage sustainable and active modes of transport and it also encompasses strategies to prevent travel during the most congested times on the highway network – the traditional AM and PM peaks. Under a robust and effective management structure, the TDMP will successfully deliver the measures and achieve the plan's vision and desired outcome, in addition to supporting LRCH in creating the most sustainable the park destination in the World that is net carbon neutral in operation.

8.438 With the dedicated London Resort Access Road and proposed junction improvements at the A2 Ebbsfleet access roundabouts, the London Resort trip generation will have a negligible impact on journey times along the A2 and will improve journey times for vehicles accessing and egressing the A2 eastbound.

8.439 As part of the development proposals and the wider strategy documents, the London Resort will contribute towards the upgrading and improving of the local walking and cycling network and the proposed new connection between Ebbsfleet International Station and London Resort jetty has the potential to benefit visitors/staff in addition to local residents or commuters wishing to use the new ferry service. The enhanced bus connections set out within the bus strategy will further enhance connectivity between rail stations, places of work and residential areas within Dartford, Gravesham and north of the river in Thurrock.

8.440 The London Resort will provide a significant boost to the economy in the region as well as providing an enhancement to the Public Transport systems in the area, which will benefit local residents as well as visitors and staff to the London Resort.

8.441 The highway modelling has assessed a worst-case private vehicle mode share using car-park accumulation however it is considered that through the measures outlined in the Active Travel Strategy, Public Transport Strategy, Off-Site Parking Plan and the TDMP, vehicle mode shares can be brought closer to the targets identified and incentives to influence travel outside of the peaks will further improve impacts.

8.442 It has been demonstrated that the objectives and aims of local and national policy can be met by the Proposed Development and overall this Transport Assessment demonstrates that, with the introduction of specific and tailored highway improvements, the highway network can accommodate the additional traffic associated with the Proposed Development. Any impact will be further reduced by the implementation of a robust and specific TDMP and other supporting Plans.

8.443 Chapter 9: *Land transport* (document reference 6.1.9) and Chapter 10: *River transport* of the ES (document reference 6.1.10) undertake an assessment of the likely significant

effects of the Proposed Development. The conclusions of the respective chapters identify that the delivery of the Proposed Development would not result in any transport-related significant environmental effects.

8.444 In conclusion, in accordance with the NPPF, the *Transport Assessment* (document reference 6.2.9.1) demonstrates that the residual cumulative impacts of the Proposed Development would not have a 'severe' impact in terms of transport matters. In this regard it finds that the Proposed Development is acceptable.

Public Rights of Way

8.445 Paragraph 98 of the NPPF explicitly notes that planning policies and decisions *'should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users…'*

8.446 Development plan policies such as Policy CS15 and DP4 in Dartford, Policy CS11 in Gravesham and Policy CSTP14 in Thurrock in the round all identify the promotion of walking and cycling routes. Paragraph 98 of the NPPF notes that planning decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

8.447 A *Public Rights of Way Assessment and Strategy* (document reference 6.2.11.9) accompanies the application and has been developed in conjunction with the *Landscape Strategy* (document reference 6.2.11.7).

8.448 The objectives of the *Public Rights of Way Assessment and Strategy* is threefold:

- To examine the existing PRoWs network within and adjacent to the Project Site;
- To identify the likely effects of the Proposed Development on the PRoWs, both within the Project Site and beyond the DCO Order Limits; and
- Make recommendations as part of a PRoW Strategy which includes proposals to enhance the PRoW network both within the Project Site as part of the new development and through linkages beyond its boundary.

8.449 The *Public Rights of Way Assessment and Strategy* was undertaken using a combination of Definitive Map and Statement information obtained from KCC and TC as well as detailed Project Site surveys undertaken during March 2020 (winter conditions) and again in August 2020 and September 2020 (summer conditions) during which all PRoWs across the Project Site were assessed.

8.450 As noted within the *Landscape Strategy* (document reference 6.2.11.7), a network of Public Rights of Way (PRoW) currently cross the Swanscombe Peninsula. The primary routes are considered to be DS1, which follows the edge of the River Thames, DS2 and DS12 which head north through the centre of the peninsula, and NU1 around Botany

Marsh. It is noted that the quality of these routes varies, with DS12 and DS2 being overgrown and flooded for parts of the year.

8.451 The other notable PRoW crossing the Kent Project Site is DS17 which connects Swanscombe and Northfleet via a bridge over the HS1 line. This is a direct but enclosed route with fencing on both sides separating the path from the steep drop into Bamber Pit to the north and the former landfill site to the south.

8.452 There are no PRoW crossing the Essex Project Site, although two pass close to the boundary.

8.453 The *Public Rights of Way Assessment and Strategy* notes there are many PRoW within the 500m Study Area external to the Kent Project Site. There are few PRoW within the 500m Study Area external to the Essex Project Site. These include Footpath 144, 193 and BOAT 98.

8.454 At the time of the PRoW winter surveys, access to routes within the Project Site was found to be generally good however a number of factors were encountered that prevented or deterred use, including poor signposting and/or way-marking, partial obstructions such as overgrown vegetation and fallen fences, waterlogging and entire submersion of routes and poorly maintained stiles/gates. The survey indicated conditions on the ground generally indicated good use of the PRoW network. None of the PRoWs appeared to be near capacity but the accessibility of some sections of PRoW were noted to be severely limited.

8.455 As noted within the *Public Rights of Way Assessment and Strategy*, under section 60 of the Countryside and Rights of Way Act 2000 (the 2000 Act), local authorities are required to develop and prepare a Rights of Way Improvement Plan for a 10 year period. The Kent Rights of Way Improvement Plan 2018 - 2028 (KROWIP), Essex Rights of Way Improvement Plan (EROWIP) and Thurrock Rights of Way Improvement Plan (TROWIP) provide a policy framework for issues relating to access and informal recreation within Kent and Essex Project Sites respectively. These documents have been reviewed and have assisted in developing a PRoW Strategy for the Project Site.

8.456 The *Public Rights of Way Assessment and Strategy* summarises the potential impacts that are likely to occur as a result of the Proposed Development. It is identified that the greatest disruption to the PRoW network will occur during construction, when the PRoW on the Swanscombe Peninsula, DS1, DS2, DS12, DS30 and DS31 will be closed to allow site clearance and construction works to proceed safely. In this particular instance, temporary closure is a more likely scenario than temporary diversion throughout the majority of the construction period, particularly for DS1, DS12 and DS31 given the scale of the Proposed Development and the contamination issues on the Kent Project Site.

8.457 Once ground works are complete and built construction commences, it may be possible to introduce footpath diversions but this would be subject to detailed construction programming and site safety assessments.

8.458 In the case of DS2, the closure will be permanent, the diverted DS12 becoming the main route north/south across the Swanscombe Peninsula.

8.459 The *Public Rights of Way Assessment and Strategy* indicates a further temporary closure will also occur in relation to DS17 during works to construct the London Resort Access Road and people mover route and the HS1 overbridge extension which forms part of that route. Over the longer term the Proposed Development presents an opportunity to improve the quality of the user experience along DS17 with a review of the fenced boundaries and potential connections into a recreational route around Bamber Pit.

8.460 From an operational perspective, the PRoW network within the Project Site will benefit from a series of upgrades, re-routing, resurfacing and access review improving the user experience and additional provision for cyclists extending the range of users and off-site connections.

Table 8-6: Potential impacts during construction and operational phases

Route	Potential impact during construction phase	Potential impact during operational phase
DR18	None	None
DR19	None	None
DR20	None	None
DR128	None	None
DR129	None	None
DR312	None	None
DS1	Temporary closures and diversions in part	Footpath to be diverted to form the route of the England Coast Path and upgraded
DS2	Footpath to be closed	Footpath to be Stopped Up
DS3	None	None
DS12	Footpath to be temporarily closed during construction	Footpath to be diverted along new route adjacent to Resort Access Road
DS17	Footpath to be temporarily closed during construction	Footpath to be upgraded
DS20	None	None
DS29	None	None
DS30	Footpath to be closed during construction works	Footpath to be diverted to align with Resort boundary along western edge
DS31 (Pilgrims' Way)	Footpath to be temporarily closed	Footpath to be upgraded
NU1	None	None
NU14	None	None
NU20	None	None

NU47	None	None
T98	None	None
T144	None	None
T193	None	None

8.461 The *Public Rights of Way Assessment and Strategy* makes a series of recommendations which can be summarised as:

- The alignment of on-Project Site PRoW should be maintained wherever possible to allow continued connectivity across the Project Site. Where this is no longer feasible or desirable, alternative routes are proposed to maintain connectivity in a manner that is as direct as possible considering public safety and visual amenity;
- New connections to be designed to form an integrated network that connects with key destinations, leisure routes and off-site PRoWs;
- Retain intended permitted route of the England Coast Path as far as practically possible. For instances where this may not be possible, ensure continual connection through the Project Site as close as possible to the intended route; and
- Where possible and appropriate, existing and proposed PRoW would be incorporated within green links and public open spaces in accordance with ecological, landscape and visual amenity aspirations, to combine experiences and create active and multifunctional open spaces, both within the Project Site and on its periphery.

Provision for walkers and less able-bodied persons

8.462 Development of the Kent Project Site presents an opportunity to enhance access to Broadness Marsh, Botany Marsh and Black Duck Marsh as well as the Thames riverside on the Swanscombe Peninsula, both in terms of expanding existing access and upgrading the quality and accessibility of routes.

8.463 The Proposed Development of the Kent Project Site also provides an opportunity to connect the proposed Ferry Terminal to local communities at Ingress Park, Swanscombe and Northfleet, via partially diverted and upgraded PRoWs.

8.464 The *Public Rights of Way Assessment and Strategy* has identified that the majority of footpaths within the Project Site are only lightly used and there is considered to be capacity to support new users on the existing network. Whilst some re-routing will be required as part of the Proposed Development, access to the existing network would be enhanced through the creation of new linkages, improved marking of routes, removal of obstructions, appropriate vegetation management and the preferable installation of gates over stiles as part of an overall enhancement programme.

8.465 For users in wheelchairs, buggies and prams, gated and more open access will improve accessibility as will improved surfaces and vegetation management to limit obstructions to movement.

Provision for cyclists

8.466 The *Public Rights of Way Assessment and Strategy* recognises an opportunity to improve cycle provision via alternative, traffic-free or improved routes. This includes a grade-separated path for the Pilgrims' Way route along the London Resort Access Road (diverted DS12) within the Kent Project Site, providing north-south connectivity and a valuable link between Swanscombe and the proposed Thames Clipper connection at the northern end of the peninsula (see Plan EDP 3). A grade separated path along the route of DS1 connecting the Sustrans Cycleway along the riverside path north of Ingress Park to Manor Way on the eastern side of the peninsula will also be provided, connecting to the north-south Pilgrims' Way route.

8.467 With regard to the existing National Cycle Network routes which pass through and connect to the Project Site, there may be some minor adjustments to the routes such as provision of road crossings and signage, but overall these will remain largely unaffected.

Provision for horse riders

8.468 The *Public Rights of Way Assessment and Strategy* has identified no evidence of equestrian use of the existing bridleway and byway network within the Study Area, although it is noted that horses could potentially use BOAT 98.

8.469 Similarly, there were understood to be no equestrian facilities on the Project Site or within the 500m detailed Study Area. There is no perceived need to provide a bridleway network across any part of the Project Site.

Conclusions

8.470 The *Public Rights of Way Assessment and Strategy* has identified a wide range of PRoWs within the Project Site and the 500m Study Area. It identifies that the vast majority of the existing PRoW network would appear to be only occasionally used owing to various factors, including poor sign posting, flooding and other obstructions. It indicates that a number of PRoWs within the wider Study Area, particularly to the south of the A2 are largely obsolete due to the loss of onward connection over the A2, albeit a subway and overbridge do provide some continuity of connectivity

8.471 The large majority of the routes will remain unchanged as a result of the Proposed Development. The *Public Rights of Way Assessment and Strategy* has identified that there is capacity and opportunities for improvement in terms of connectivity, maintenance and user experience within the Project Site, particularly on the Swanscombe Peninsula and in linking to and providing off-site routes, particularly cycleways.

8.472 The Proposed Development is considered to provide a notable opportunity to enhance the provision and quality of PRoWs across the Project Site the ferry terminal, Swanscombe

and the residential areas of Ingress Park and Northfleet for an increased variety of users. The aspirations of the England Coast Path can readily be accommodated within the scheme and new permissive paths and cycleways will extend the overall provision and range of users.

8.473 In conclusion, the Proposed Development results in relatively modest interventions to existing PRoWs but this is considerably off-set by the proposed improvements and mitigations proposed by the London Resort, in accordance with the aspirations of stakeholders, including Natural England (as promoted of the England Coast Path), EDC, DBC, GBC and TC. In this regard, the Proposed Development is considered to accord to the principles of the NPPF and development plan policies which seek to encourage healthy lifestyles.

Accessibility

8.474 The design principles of the accessibility strategy, as defined in the *Landscape Strategy* (document reference 6.2.11.7), are:

- Sustainable modes of transport and local community connectivity are central to the access strategy with pedestrian and cycle access forming a key part in the access plan.
- The Pilgrims' Way forms the primary pedestrian/cycle route connecting Swanscombe to the London Resort and ferry terminal providing local access and a grand sense of arrival with panoramic viewpoints along the route.
- A network of way-marked routes will provide pedestrian and cycle access around the natural areas of the peninsula (comprising existing and diverted PRoWs along new route alignments) and including the England Coastal Path.
- Informal 'Nature Trails' will be created in the northern-most part of Broadness Salt Marsh where access will be limited to reduce disturbance to wildlife.
- New board-walks and bird hides will provide safe access within the marsh areas and along the Thames riverside with clear 'wildlife only' areas maintained.
- Throughout the whole of the London Resort, at both ferry terminals and Ebbsfleet Station a way-finding strategy will be developed to provide clear directional guidance and orientation information for all. This will be developed with all users in mind; sound, touch and smell playing a role as well as visual cues.

Navigational Risk Assessment

8.475 A *Preliminary Navigational Risk Assessment* (PNRA) (document reference 6.2.10.1) accompanies the application. Prepared in consultation with PLA, Port of Tilbury, Uber Boat by Thames Clippers and other stakeholders, the *PNRA* identifies existing risks associated with the navigation of the River Thames. It identifies the nature of the river operations by the Proposed Development during both construction and operational

phases and proceeds to assess the generis and specific risks associated with this additional activity.

8.476 The *PNRA* identifies that the anticipated vessel movements associated with the Proposed Development are thought to have a low level increase to the overall vessel movements that occur within the vicinity of the Kent and Essex Project Sites, with the majority of the service operations (waste and material supply) occurring more frequently during the construction stage between 2022 and 2029.

8.477 The main conclusion of this *PNRA* is that the identified specific hazards are thought to be capable of being managed using the existing control measures with the majority of the risks scoring either as minor or moderate. Additional potential control measures are presented that could be implemented to further reduce any potential risks. However, it is noted that there are further specific hazards that will need to be considered as the associated designs for the Proposed Development are progressed. These include the landside operations relating to impacts on the sightlines and additional lighting along with the vessel contact with marine infrastructure associated with the Proposed Development. Consequently, a Final NRA will be prepared post-DCO submission.

Conclusion

8.478 The London Resort has carefully considered the transport strategy over many years, reflecting detailed discussions held with key transport stakeholders. This has included making greater use of the Port of Tilbury for both construction and operational purposes as a result of consultation responses received.

8.479 The existing conditions surrounding the Kent and Essex Project Site have been thoroughly reviewed to consider the current accessibility of the site by highway, public transport and active modes of transport. Robust information has been supplied by industry experts and underpins the *Transport Assessment* which concludes that the residual cumulative impacts of the Proposed Development would not have a 'severe' impact in terms of transport matters. In this regard it finds that the Proposed Development is acceptable and in accordance with the NPPF and other development plan documents.

8.480 The dedicated London Resort Access Road and improvements proposed at the A2 Ebbsfleet junction roundabouts mitigate impacts on journey times and queueing, not impacting the safety of the existing junction operation. Likewise, the Proposed Development will allow for the beneficial use of the River Thames, with detailed discussions continuing with a number of stakeholders.

8.481 As part of the development proposals and the wider strategy documents, the London Resort will contribute towards the upgrading and improving of the local walking and cycling network and the proposed new connection between Ebbsfleet International Station and London Resort jetty has the potential to benefit visitors/staff in addition to local residents or commuters wishing to use the new ferry service. Public access across the Swanscombe Peninsula will undergo significant improvements as a result of the Proposed Development and the proposed PRoW strategy.

AIR QUALITY

Overview

8.482 The NPPF notes, at paragraph 181, that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for air quality and identify opportunities to improve air quality or mitigate impacts. The NPPF also links transport with air quality implications (at paragraph 103).

8.483 At a local level, policies within the development plan, for example Policy DP5: Environmental and Amenity Protection of the Dartford Development Policies Plan (July 2017), seek to ensure development proposals will not result in unacceptable material impacts on public health, including air quality.

Figure 8-11: Key planning policy relating to air quality

National Planning Policy Framework (February 2019)
- Chapter 9: Promoting sustainable transport
- Chapter 15: Conserving and enhancing the natural environment

Dartford Development Policies Plan (July 2017)
- Policy DP5: Environmental and Amenity Protection

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD1: Minimising Pollution and Impacts on Amenity

Ebbsfleet Implementation Framework (2017)
- Pages 31, 91 & 128

Assessment

8.484 The application is accompanied by an air quality assessment, found within Chapter 16: *Air quality* of the ES (document reference 6.1.16).

8.485 The assessment undertook a review of baseline conditions which identified that the Proposed Development is surrounded by a number of Air Quality Management Areas (AQMAs), with local authority monitoring data indicating that air quality objectives have been exceeded at a number of nearby roadside locations, including along London Road and in the vicinity of Tilbury Docks. Part of the Kent Project Site is in the Northfleet Industrial Area AQMA identified by GBC, and close to the Dartford AQMA identified by DBC.

8.486 Owing to the size of the Proposed Development and sensitivity of the surrounding area, it was identified as a high-risk site with the potential for temporary impacts. Best practice mitigation measures have been outlined for controlling dust and emissions during construction. With the implementation of these measures throughout the construction phase, it is anticipated that any residual effects on air quality will not be significant.

8.487 With regards to operational impacts, the chapter details the methodology for a detailed air quality modelling study which will be carried out in order to predict and quantify the likely impact associated with the Proposed Development. Traffic modelling information has informed the air quality modelling to ensure there is appropriate correlation and any impacts from vehicular traffic (both construction and operational) is reflective of the anticipated levels of movements from the London Resort.

8.488 The assessment also takes into consideration air quality at protected nature conservation sites in the locality, discussed further in Chapter 12: *Terrestrial and freshwater ecology and biodiversity* of the ES (document reference 6.1.12).

Construction

8.489 During construction, air quality can be affected by the release of dust and very fine particles known as 'particulates', and by fumes from vehicles, plant and machinery.

8.490 Proposed mitigation includes a range of measures to minimise dust, including road cleaning and the use of physical barriers and covers on chutes, skips and materials stockpiles likely to give rise to dust, and the use of mains electricity in preference to diesel or petrol–powered generators. The reliance on river transport for construction materials and waste will reduce substantially the emissions from road-based construction traffic.

Operation

8.491 During operation, vehicle fumes from road and river traffic, emissions from any on-site energy centre and odour from waste handling might be of concern in the absence of mitigation.

8.492 The impact of operational road traffic generated by the Proposed Development has been predicted using dispersion modelling for a number of assessment years. Using the worst-case assumption that there is no change in existing background air quality conditions, one survey location is predicted to experience a moderate adverse impact owing to operational traffic generated by the Proposed Development for the 2024 assessment scenario. Should background air quality conditions improve in line with Government projections, the predicted impact at this receptor would be negligible. The impact at all remaining receptors for all assessment years is predicted to be negligible, even using the worst case assumption that there is no change in existing background air quality conditions.

8.493 The impact from emissions associated with the proposed energy centre has been predicted using dispersion modelling, and owing to the predominantly emission free heating strategy that uses heat pumps, the contribution from energy centre emissions is

shown to be very small and can be ruled insignificant in line with Environment Agency guidance.

8.494 The impact from traffic and energy centre emissions has also been predicted at designated nature conservation sites in order to determine the potential for significant effects to occur. Some of the surveyed nature conservation sites would have a minor increase in nitrogen deposition from air emissions. Nitrogen enriches the soil and can affect the range of plant life that a soil can sustain. The outputs from this work are taken into account in Chapter 12: *Terrestrial and freshwater ecology and biodiversity* of the ES (document reference 6.1.12).

8.495 Assessment of the potential for odour effects to occur from the proposed wastewater treatment works on the north-eastern side of Swanscombe Peninsula identified a potential slight adverse odour impact close to the works. Odour effects at off-site receptors are predicted to be negligible. With the adoption of standard odour mitigation techniques for the wastewater treatment works, no significant odour effects are predicted.

8.496 The potential effects from vessel emissions associated with the proposed development has been assessed qualitatively, taking into account the likely increase in boat movements associated with the development and the locations of proposed jetties. Owing to the distance between source and receptor, the impact from vessel emissions is assessed to be negligible.

Conclusion

8.497 Detailed assessments have been undertaken in respect of air quality to understand the baseline position and any effects the Proposed Development may have to sensitive receptors during the construction and operational phases. The assessments have utilised traffic modelling data relevant to the Proposed Development to accurately reflect and assess the circumstances over a number of assessment years.

8.498 Assuming a worst-case scenario, one survey location is predicted to experience a moderate adverse impact on air quality owing to operational traffic generated by the Proposed Development for the 2024 assessment scenario. However, in line with Government projections and improving technology and strengthening legislation, this is anticipated to improve over time to become negligible. All other aspects are not expected to result in significant impacts.

8.499 The Proposed Development is therefore found to be acceptable in respect of air quality matters, thereby in compliance with national and local planning policy objectives in respect of air quality.

LIGHTING

Overview

8.500 Paragraph 180 of the NPPF, amongst other matters, seeks to ensure development limits the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

8.501 Similar requirements are stipulated within local development plan policies, including Policy DP5: Environmental and Amenity Protection of the Dartford Development Policies Plan (July 2017), Policy CS19: Development and Design Principles of the Gravesham Local Plan Core Strategy (September 2014) and Policy PMD1: Minimising Pollution and Impacts on Amenity of Thurrock's Core Strategy and Policies for Management of Development (January 2015).

Figure 8-12: Key planning policy relating to lighting

National Planning Policy Framework (February 2019)
- Chapter 15: Conserving and enhancing the natural environment

Dartford Development Policies Plan (July 2017)
- Policy DP5: Environmental and Amenity Protection

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD1: Minimising Pollution and Impacts on Amenity

Assessment

8.502 The application is accompanied by a *Lighting Statement* (document reference 7.10), providing the details on artificial lighting strategy for the London Resort. The application is also accompanied by an *Artificial Lighting Impact Assessment* (document reference 6.2.12.11).

8.503 As Swanscombe Marsh is currently an area unilluminated by artificial light sources during the hour of darkness and predominantly a dark area during night-time, it is evident that the implementation of any form of artificial lighting would have an impact on the existing position.

8.504 To maintain the well-being and continued existence of wildlife and natural habitats which are to be maintained and a lighting strategy has been developed within the *Lighting Statement* to ensure these areas are maintained with minimal intrusion of undue light spill or obtrusion. The *Lighting Statement* has been developed alongside the masterplanning, ecological, landscape and other constraints.

8.505 A number of factors have influenced the *Lighting Statement*. These include:

- Nearby sensitive receptors, such as the residential developments of Ebbsfleet Green and Ingress Park;
- Ecological constraints and sensitivities;
- Navigation safety matters given the proximity to the River Thames, in accordance with Port of London Authority requirements; and
- Security, including minimum lighting requirements.

8.506 In accordance with guidance, the document classifies Lighting Environmental Zones across the Proposed Development. Each of the zones identifies the principles of how lighting will be considered. For example, those zones identified as being 'rural' in nature, such as Black Duck Marsh, Broadness Marsh and Botany Marsh, will represent a low district brightness. Conversely, those zones covering the Leisure Core represent an urban setting with high district brightness. This accords to the general principles that lighting is an important aspect of the London Resort, helping to provide identity and character and delivering a visitor experience expected of a world-class entertainment resort.

8.507 The *Lighting Statement* notes that the external artificial lighting for the Proposed Development will be based on British design standards and the relevant guidance and codes.

Construction

8.508 The document also considers construction lighting, noting that mobile task lighting will be used to illuminate areas under construction during the hours of darkness. Directional luminaires will be used to limit unwanted light spill. These will be directed away from sensitive residential and ecological receptors. Construction site lighting outside normal working hours will be restricted to the minimum required for safety and security.

Conclusion

8.509 The *Artificial Lighting Impact Assessment* identifies there will be a noticeable difference from the existing baseline position given the absence of existing artificial lighting across the Swanscombe Peninsula. The *Lighting Statement* has been developed alongside the masterplanning exercise to develop the principles of a well-considered lighting strategy for the London Resort both during construction and operational phases. Further details of the lighting strategy will be refined and provided through the requirements process once the DCO has been made. It is considered a lighting strategy can be developed which is appropriate for the proposed land use as a world-class entertainment resort which has inherent need for artificial lighting, but which also respects identified sensitive receptors, ecology a safety matters.

ECOLOGY

Overview

8.510 The NPPF, at paragraph 170, requires that development proposals contribute to and enhance the natural and local environment by, *inter alia*, protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). Paragraph 175 requires the LPA to refuse a planning application if any impact cannot be avoided, mitigated or compensated for. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

8.511 At a local level, development plan policies reiterate broadly similar themes, requiring development proposals to appropriately assess and minimise harm to ecology and biodiversity. Amongst others, Policy DP25: Nature Conservation and Enhancement, Policy CS12: Green Infrastructure, Policy CS13: Green Space, Sport and Recreation, Policy CSTP19: Biodiversity and Policy PMD7: Biodiversity, Geological Conservation and Development all relate to ecological and biodiversity matters.

Figure 8-13: Key planning policy relating to ecology

National Planning Policy Framework (February 2019)
- Chapter 15: Conserving and enhancing the natural environment

Dartford Development Policies Plan (July 2017)
- Policy DP25: Nature Conservation and Enhancement

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS12: Green Infrastructure
- Policy CS13: Green Space, Sport and Recreation

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSTP19: Biodiversity
- Policy PMD7: Biodiversity, Geological Conservation and Development

Ebbsfleet Implementation Framework (2017)
- Pages 41-43 & 124-129

Assessment

8.512 An *Ecology Baseline Report* (EBR) accompanies the application as an appendix to Chapter 12: *Terrestrial and freshwater ecology and biodiversity* of the ES (document reference

6.1.12). The *EBR* identifies that the baseline ecological investigations undertaken in respect of the Project Site include:

- Desk study;
- Extended Phase 1 Habitat Survey;
- River Corridor Survey and River Habitat Survey; and
- Detailed (Phase 2) surveys:
  - Botanical survey;
  - Birds;
  - Bats;
  - Dormouse;
  - Badger;
  - Otter;
  - Water vole;
  - Harvest mice;
  - Great crested newts;
  - Reptiles; and
  - Aquatic and terrestrial invertebrates.

Designations

8.513 The *EBR* sets out the search radii from the Order Limits for various designations. The search areas identified were considered sufficient to cover the potential Zone of Influence (ZoI) of the Proposed Development in relation to designations, habitats and species. The following paragraphs provide a high-level overview of the designations present within the ZoI.

Statutory designations

8.514 The *EBR* notes that no part of the Project Site is covered by any statutory designations designated for ecological reasons. It is, however, noted that the Baker's Hole Site of Special Scientific Interest (SSSI) which is designated for geological reasons is within the Kent Project Site. Additionally, within the potential ZoI of the Project Site lie Swanscombe Skull Site SSSI, Lion Pit SSSI, Globe Pit SSSI and Purfleet Chalk pit SSSI which are also

designated for geological reasons. These SSSIs were not considered under the Ecological Impact Assessment (EcIA) as the reasons for designation are not related to ecology.

8.515 Four international statutory designations are found within 15 km of the Project Site, two of which are considered likely to be impacted by the Proposed Development. The first is the Thames Estuary and Marshes Special Protection Area (SPA)/Ramsar. The second is the Medway Estuary and Marshes SPA/Ramsar/SSSI.

8.516 The *EBR* notes there are seven statutory designations of national importance within 5 km and two more at a greater distance but considered to be within the Zone of Influence due to ecological connectivity. Four of these national designations have potential to be impacted by the Proposed Development and therefore considered as Important Ecological Features (IEFs). These are identified as Darenth Woods SSSI, Inner Thames Marshes SSSI, South Thames Estuary and Marshes SSSI and West Thurrock Marshes SSSI.

Proposed statutory designations

8.517 LRCH, with the agreement of the main landowners, has been undertaking ecological surveys on a regular basis across much of the Swanscombe Peninsula since 2014. The Swanscombe Peninsula contains significant areas of brownfield land (some of which is contaminated) as a result of the extensive chalk extraction (upon which the built element of the London Resort will be located), and also contains several marshes of differing quality. LRCH has engaged with Natural England (and others) over a number of years and has shared various findings, including publication as part of formal consultation phases. LRCH has engaged specialist environmental and ecological advisers in recognition that where there will be effects on any habitats then there will be a need to minimise these and provide suitable mitigation on and off-site. LRCH has engaged with Natural England and shared strategies to this effect.

8.518 LRCH was notified by Natural England in May 2020 of its Thames Estuary review for potential locations that may be considered for SSSI designation. Natural England again referred to the process in its consultation response of September 2020. In late November 2020 Natural England issued a 'Pre-Notification' to LRCH, other landowners and various stakeholders and interested parties. LRCH is in dialogue with Natural England regarding the process, which if it does progress will take between 15-18 months. LRCH recognises that this carries weight as a planning consideration and has taken the potential designation into consideration in the *Environmental Statement* (document reference 6.1.1-6.1.22) (and mitigation strategies). The outcome of any consideration of whether to confirm the Swanscombe Peninsula SSSI will not be known until into 2022.

Non-statutory designations

8.519 The EBR notes there are 19 non-statutory designations at or within 2 km of the Project Site. The only such designation within the Project Site is the Botany Marshes Local Wildlife Site (LWS) within the Kent Project Site. Three further LWSs are found adjacent to the Kent Project Site. These four LWSs are considered likely to be impacted by the Proposed Development.

Habitat identification

8.520 The Project Site is a mosaic of habitats offering extensive pockets of wetland and scrubland within a largely urbanised setting, immediately adjacent to the Thames Estuary. The following paragraphs seek to provide a high-level overview of habitats found within the Kent and Essex project Sites.

Kent Project Site

8.521 The *EBR* summarises the Kent Project Site as supporting a range of habitats. These are identified to include intertidal sediment, saltmarsh, wetlands, including running water (the Ebbsfleet), open water (ponds), reedbed/swamp and ditch networks, a range of grasslands and open mosaic habitats, arable, scrub, woodland, chalk cliffs/exposures, buildings and bare ground. The extensive semi improved grassland and scrub mosaic, broadleaved semi-natural woodland, poor semi-improved grassland and the River Ebbsfleet corridor are of value at the Local level. The open mosaic on previously developed land, coastal/floodplain grazing marsh, waterbodies (primarily the ditch network), and areas of higher quality grassland are all considered of district level importance. The swamp (reedbed) is considered of County level importance. There are also populations of a number of nationally scarce plant species which are of National importance.

Essex Project Site

8.522 The *EBR* summarises the habitats as comprising predominantly hardstanding with small linear areas of poor semi-improved grassland and scrub, adjacent to seasonally wet ditches.

Surveys

8.523 An extensive number of species surveys were undertaken in 2012 and 2016 and were updated in 2020. The *EBR* sets out the methodology for all the surveys undertaken across the Project Site, including the Extended Phase 1 Habitat Survey, River Corridor Survey, River Habitat Survey and all Detailed (Phase 2) surveys. The requirements for any additional, follow-up surveys post-submission of the DCO application are identified.

8.524 The *EBR* also identifies the results of the surveys to establish the baseline conditions and identify Important Ecological Features (IEF).

Important Ecological Features

8.525 The *EBR* provides an overview of the various IEFs and their nature conservation value. A summary of this is reproduced in Table 8-8. Further detail on the key attributes of each of these IEFs is provided in *EBR*. The *EBR* has determined their Nature Conservation Value based upon Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines, as discussed in section 3 of the *EBR*. These are summarised in Table 8-7.

Table 8-7: Value/potential value geographical context

Value/potential value	Geographical context
International	Beyond the UK
National	England
Regional	south-east England
County	Kent or Essex
District	Dartford, Gravesend or Thurrock
Local	Swanscombe and Greenhithe Civil Parish, Bean Civil Parish, or Southfleet Civil Parish, or the towns of Northfleet, Gravesend or Tilbury
Site	The Project Site and immediate environs

Table 8-8: Summary of Important Ecological Features to be assessed within the Ecological Impact Assessment

Important Ecological Feature	Key Attributes	Nature Conservation Value
Designations		
Thames Estuary and Marshes SPA/Ramsar	Extensive intertidal mudflats with saltmarsh and channel systems. Internationally importance of assemblage of birds and wintering populations of many wader species.	International
Medway Estuary and Marshes SPA/Ramsar/SSSI	Single tidal system with the Swale and joins the southern part of the Thames Estuary between the Isle of Grain and Sheerness. Internationally importance of assemblage of birds and wintering populations of many wader species.	International
Darenth Woods SSSI	Some of the most valuable areas of ancient semi-natural woodland in north-west Kent with rare woodland types.	National
Inner Thames Marshes SSSI	Largest remaining expanse of wetland bordering the upper reaches of the Thames Estuary. Diverse bird interest especially the variety of breeding birds and the numbers of wintering wildfowl, waders, finches and birds of prey.	National
South Thames Estuary and Marshes SSSI	Extensive mosaic of grazing marsh, saltmarsh, mudflats and shingle characteristic of the estuarine habitats of the north Kent marshes. Freshwater pools and some areas of woodland provide additional variety and complement the estuarine habitats. Supports outstanding	National

	numbers of waterfowl, total counts regularly over 20,000.	
West Thurrock Lagoon and Marshes SSSI	One of the most important sites for wintering waders and wildfowl on the Inner Thames Estuary. Extensive intertidal mudflats together with a large and secure high tide roost, attracts waders in nationally important numbers, with significant populations of other bird species. The adjacent Stone Ness saltmarsh is noted for the size and character of its high marsh plant community.	National
Botany Marshes LWS	Reedbed and potential for ditch & grazing marsh restoration. Reedbed and grazing marsh are of principal importance in England. Also supports three species of reptile, water vole, otter and is of value to birds.	County
Ebbsfleet Marshes, Northfleet LWS	Range of habitats including reedbed, calcareous stream, lake, scrub, woodland, calcareous and neutral grassland. Protected species have been recorded including reptiles and great crested newts.	County
Alkerden Lane Pit LWS	Contains nationally scarce plants and Kent's largest population of green-flowered helleborine (*Epipactis phyllanthes*). Also contains round leaved wintergreen (*Pyrola rotundifolia*) and several species of nationally rare and scarce invertebrates.	County
Tilbury Marshes LWS	Diverse saltmarsh flora. Good grazing-marsh flora. An important invertebrate habitat destroyed by development, but some of the key species may survive on these remaining fragments.	County
Habitats/flora		
Rare plants	Populations of 13 nationally scarce species were found in 2016. Eight were re-found in 2020.	National
Broad leaved Semi Natural Woodland	Woodland with good canopy species and ground flora species diversity. Connects to other woodlands in wider area. – Meets criteria for Priority habitat.	Local
Scrub	Extensive mature and colonising scrub forming a corridor of woody habitats between the A2 and the River Thames.	Local
Semi-improved grassland	Including areas of species-poor semi-improved grassland and areas of semi-improved neutral, and calcareous grassland (with relict areas of	Local to District

	more species-rich grassland of NVC MG1d and CG2 but not extensive or fine examples).	
Coastal/Floodplain Grazing Marsh	Botany Marsh West - Priority Habitat coastal/floodplain grazing marsh but a species poor example. Would qualify as a LWS.	District
Open mosaic on previously developed land	Discrete areas within the Kent Project Site that fulfil the Priority Habitat description.	District
Waterbodies (ponds, standing water and ditches)	Extensive ditch network around the peninsula with associated ponds. Ditch network forms part of a large marsh area including Botany Marshes LWS and adjacent grazing marsh and is considered of district level. Some ponds, within Broadness Grassland particularly, are contaminated by leachate from the nearby cement production facility and are of negligible ecological value.	District
Swamp (reedbed)	Three main areas in Black Duck Marsh, CTRL Wetland and Botany Marsh, the latter of which is partially designated as a LWS. The other areas could qualify as LWSs and all qualify as Priority habitat.	County
River Ebbsfleet	Acts as a wildlife corridor and is linked to reed bed and woodland habitats. Moderate water quality.	Local
Species		
Wintering Wading Bird Assemblage	Supports many of the species associated with the nearby SPA/Ramsars.	International
Wintering terrestrial bird assemblage	28 species of conservation concern recorded by in low to moderate numbers.	County
Breeding Bird Assemblage	91 species recorded of which 29 were listed on the Amber list of Birds of Conservation Concern and 17 on the Red list.	County
Foraging Bat Assemblage	Assemblage of at least eight species, potentially up to 10 including one Kent BAP species. However, the activity is predominantly of common pipistrelle (*Pipistrellus pipistrellus*) bats.	District
Roosting Bat Assemblage	Two building confirmed as transitional summer roosts for low numbers of common and widespread species. Other buildings with high and moderate potential are present. No tree roosts confirmed but nine trees with high potential are present.	Local

Dormouse	Confirmed breeding population within the Kent Project Site. Considered to be using the Kent Project Site for dispersal, foraging and breeding. Likely to be a meta population with that close to the Bluewater Shopping Centre.	Local
Otter	Confirmed present within Blackduck Marsh and assumed present in low numbers on the suitable habitat throughout the ditch network. Reedbeds, marshes and on the River Ebbsfleet.	Local
Water Vole	Latrines and feeding sign found in Botany Marsh East and West, on Black Duck Marsh and in the CTRL wetland – likely breeding and therefore qualifies as LWS.	District
Harvest Mouse	Considered likely to be present and so would qualify the Project Site as a LWS.	Local
Amphibian assemblage	Likely to support four species and meet criteria for LWS selection.	Local to District
Reptile assemblage	Three species supported. Exceptional populations of common lizard (*Zootoca vivipara*; >20), slow-worm (*Anguis fragilis*; <20*)* and grass snake (*Natrix natrix;* >10*)*. Many parts of the Kent Project site meet criteria for LWS selection.	District
Terrestrial Invertebrates	Current data in process, but 22 species of conservation concern so far recorded and a total of 262 species. Considered likely to remain of National importance.	National
Aquatic Invertebrates	Current data in process but previous data suggests an assemblage of County to Regional importance.	County to Regional

Habitats/flora

Terrestrial and freshwater ecology

8.526 Overall, despite the residual effects identified above it is considered that the scheme is capable of delivering an overall Biodiversity Net Gain subject to the creation of a biodiversity offsetting scheme involving the creation of new wetland habitat, including floodplain grazing marsh, ditches, reedbeds, and delivery on-site of a suite of habitat creation and enhancement measures to create/maintain a mosaic of habitats as currently present on site, along with their long term management and maintenance

Marine ecology

8.527 A *Marine Ecology and Biodiversity Baseline Conditions* (document reference 6.2.13.2) accompanies the application. It considers matters relating to water quality, plankton,

intertidal habitats and species, subtidal habitats and species, non-native species, saltmarsh, fish, marine mammals and designated sites.

Designated sites

8.528 Sites of international conservation importance within the vicinity of the Project Site are the Thames Estuary and Marshes Special Protection Area (SPA), and the Thames Estuary and Marshes Ramsar Site.

8.529 Sites of national conservation importance within the vicinity of the Project Site include the Swanscombe Marine Conservation Zone (MCZ) and the Inner Thames Marshes, West Thurrock Lagoon and Marshes, South Thames Estuary and Marshes, and Mucking Flats and Marshes Sites of Special Scientific Importance (SSSIs).

Table 8-9 Designated sites, protected features and distance from the Project Site

Designated sites	Distance to the Kent Project Site (km)	Distance to the Essex Project Site (km)
Swanscombe MCZ	0	4
Thames Estuary and Marshes SPA	8	4.6
Thames Estuary and Marshes Ramsar	3	4.6
Inner Thames Marshes SSSI	5.7	9.7
West Thurrock Lagoon & Marshes SSSI	1	5
South Thames Estuary and Marshes SSSI	7.1	3.1
Mucking Flats and Marshes SSSI	8.4	4.4

Mitigation and Biodiversity Net Gain

8.530 The application is supported by the submission of an *Ecological Mitigation and Management Framework* (EMMF) (document reference 6.2.12.3). The *EMMF* details the overall mitigation strategy required to retain, protect and enhance the nature conservation value of the Project Site over the lifetime of the Proposed Development. It is stated that the aim and objectives for this *EMMF* have been developed based on the vision of the Proposed Development combined with the legislative and policy requirements of the Important Ecological Features (IEFs) present within the Project Site, which form an integral part of the scheme design for the future. The IEFs have been summarised in the paragraphs above but are discussed in detail within the *Ecology Baseline Report* (document reference 6.2.12.1).

8.531 The overall aim of this *EMMF* is to enable the creation of a biodiverse and resilient green network integrated into the landscape of the local area, thereby translating the vision and

core principles into the detailed design of the London Resort. The *EMMF* uses a combination of both on and off-site biodiversity enhancements to arrive at a strategy by which the Proposed Development will achieve an overall Biodiversity Net Gain in practice.

8.532 The *EMMF* considers both construction and operational phases. During the construction phase the measures described in the *EMMF* seek to protect, maintain and manage existing features of ecological value that are to be retained within the Proposed Development. Following completion of each development phase, the measures described seek to ensure that the ecological features retained/created or enhanced within the Project Site are retained and managed in perpetuity.

8.533 The *EMMF* seeks to identify appropriate mitigation measures. These mitigation measures are in the process of being discussed and agreed with relevant statutory bodies, including Natural England, and further updates will be provided during the course of the Examination.

Inherent mitigation

8.534 The *EMMF* summarises the important habitats that are to be retained, enhanced and maintained throughout the construction and operational phases of the Proposed Development. In particular, the key areas of habitat to be retained (and enhanced where possible) are recognised as:

- Saltmarsh on the north west and north east fringes of the Swanscombe Peninsula;
- Grassland/scrub mosaic on the former Broadness saltmarsh;
- Black Duck Marsh (reedbed and open water) on the western side of Swanscombe Peninsula; and
- Botany Marsh East (reedbed, grassland and scrub) on the eastern site of Swanscombe Peninsula.

Additional mitigation (on-site)

8.535 To partially compensate for the overall loss of habitat, areas of retained habitat will be enhanced through sensitive restoration and management in order to maintain the diversity and abundance of species within the Project Site. This will involve management of scrub to maintain a varied age structure and mosaic of open and woody habitats and prevent encroachment into wetland areas, as well as measures to retain populations of invertebrate prey such as enhancing retained Open Mosaic Habitat (OMH),

8.536 In addition to enhancing the retained habitats summarised above, 5.7 km of new ditches will be created, along with 7.5 ha of new reedbed/bankside habitat. The amount of saltmarsh habitat will be increased through an approximately 3 ha managed retreat on the northern and eastern edge of Swanscombe Peninsula to the benefit of the invertebrates associated with this habitat and therefore the species which prey upon them.

Compensation (off-site)

8.537 The *EMMF* undertakes calculations on Biodiversity Net Gain (BNG) using the DEFRA Biodiversity Metric 2.0. Despite significant planned enhancement of existing on-site habitats, it is not considered possible to offset all impacts within the Project Site and therefore some off-site compensation will be necessary in order to achieve a net gain to biodiversity. For example, the Proposed Development will result in the loss of an area of reedbed and coastal/floodplain grazing marsh and will result in the net loss of scrubland habitat. The *EMMF* identifies that it is not considered possible to compensate for these losses within the Project Site due to spatial and topographical constraints.

8.538 In addition, off-site land is required to offset effects on protected species and land functionally linked to various designated ecology assets within the ZoI, namely the Thames Estuary & Marshes and Medway Estuary & Marshes SPA/Ramsar sites.

8.539 The *EMMF* identifies general principles for procurement of compensatory land, including that the land will be situated within the Greater Thames Marshes Nature Improvement Area (NIA), as close to the Project Site and both SPA/Ramsar sites as possible.

8.540 Off-site land will be enhanced, creating habitat totalling at least 40 ha of grazing marsh and reedbed habitats in order to directly offset net losses of those habitats within the Project Site at a 2:1 ratio. The provision of this land will provide important wetland habitat for wintering waterfowl and waders and is intended to mitigate against likely effects to the SPA/Ramsar sites, as detailed in the *Shadow Habitats Regulations Assessment* (document reference 6.2.12.4). The off-site compensation land area will include additional land area, forming new habitats sufficient to achieve a biodiversity net gain.

8.541 As a result of these requirements, a detailed land search has been undertaken and as identified a number of sites which are suitable. With the identification of a number of options discussions are taking place with appropriate landowners.

Additional mitigation (on-site)

8.542 The *EMMF* identifies additional construction phase mitigation, including:

- Sensitive habitat clearance;
- Physical protection measures, including Ecological Protection Zones of at least 5m;
- Sensitive or restricted lighting; and
- Pollution prevention measures.

8.543 The *EMMF* identifies additional operational phase mitigation, including:

- Habitat enhancement;
- Habitat creation (on-site);

- Control of chemical usage;
- Management of disturbance impacts; and
- Habitat creation (off-site).

Conclusion

8.544 The Project Site has been the subject of extensive ecological surveys, with assessments dating back to 2012. As a result, a significant level of background survey data has enabled a detailed understanding of the habitats and wildlife that benefit from the natural and urban habitats present across the Project Site. In some cases, ecology surveys are ongoing to maintain and/or provide the comprehensive picture across the Project Site, including, for example, wintering birds and aquatic surveys.

8.545 With this detailed appreciation and understanding of the Project Site, it has been possible to identify those areas with ecological significance and those areas with lesser importance ecologically. The surveys have identified significance within the Kent Project Site but not within the Essex Project Site, as could be expected given the existing status of the sites, with the Kent Project Site much more open and undeveloped compared to the urban and built form present at the Essex Project Site.

8.546 This spectrum has in turn informed the *Illustrative Masterplan* (document reference 2.21) and the *Landscape Strategy* (document reference 6.2.11.7), while also being able to identify appropriate mitigation strategies for those ecological aspects which will be adversely affected by the Proposed Development. It is considered that, with the extensive mitigation measures identified, combined with the overarching substantial public interest and benefit arising from the Proposed Development, ecological matters can be appropriately managed in accordance with national and local planning policy requirements. While further detailed work and mitigation measures require agreement from Natural England and other statutory organisations where relevant, the Proposed Development will preserve, enhance and mitigate against any adverse impacts upon habitats and ecological quality.

LANDSCAPE AND VISUAL EFFECTS

Overview

8.547 At a high level, the NPS for National Networks (December 2014) considers landscape and visual impacts, and at paragraph 5.143 recognises the landscape and visual effects of projects will *'vary on a case by case basis according to the type of development, its location and the landscape setting of the Proposed Development.'* Further parts of the document consider assessment methodology, decision making and mitigation.

8.548 Paragraph 133 of the NPPF states that *'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their*

openness and their permanence'. Paragraph 143 states that *'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'*. Paragraph 146 states *'Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it'* and includes *'local transport infrastructure'*.

8.549 Chapter 15 of the NPPF recognises and seeks to protect and enhance the natural and local environment, to include landscapes. At Chapter 12, amongst other matters, paragraph 127 of the NPPF notes that developments should be *'visually attractive as a result of good architecture, layout and appropriate and effective landscaping'* while *being 'sympathetic to local character and history, including the surrounding built environment and landscape setting…'*. Paragraph 170 describes ways in which planning policies and decisions should contribute to the natural and local environment, including *'protecting and enhancing valued landscapes'* and *'recognising the intrinsic character and beauty of the countryside'*.

8.550 At a local level within development plan documents, policies such as Policy CS12: Green Infrastructure seek to protect landscape characters and valued landscapes. The EDC Implementation Framework also identifies principles of landscaping, introducing the concept of a 'Garden Grid' and a public realm strategy for the Ebbsfleet Garden City area.

Figure 8-14: Key planning policy relating to landscape and visual impact

NPS for National Networks (December 2014)
- Paragraphs 5.143-5.161

National Planning Policy Framework (February 2019)
- Chapter 12: Achieving well-designed places
- Chapter 13: Protecting Green Belt land
- Chapter 15: Conserving and enhancing the natural environment

Dartford Core Strategy (September 2011)
- Policy CS 13: Green Belt
- Policy CS 14: Green Space

Dartford Development Policies Plan (July 2017)
- Policy DP2: Good Design in Dartford
- Policy DP24: Open Space
- Policy DP25: Nature Conservation and Enhancement

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS12: Green Infrastructure
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSTP20: Open Space

- Policy CSTP23: Thurrock Character and Distinctiveness

Thurrock Borough Local Plan (September 1997) Saved Policies

- Policy BE3: Urban Open Spaces

Ebbsfleet Implementation Framework (2017)

- Throughout

Landscape and visual baseline

8.551 The application is accompanied by *Landscape and Visual Impact Assessment Baseline Report* (LVIABR) (document reference 6.2.11.1). The purpose of that document is to identify the landscape and visual baseline conditions of the Project Site and its surrounding area, to inform the design and layout of the proposals and to establish an appropriate scope of work to facilitate an assessment of the effects predicted to arise from the Proposed Development, as part of the EIA process.

8.552 As noted within the LVIABR, landscape and visual effects are independent but related issues. Landscape effects relate to changes to the landscape fabric and the features contributing to the landscape character and quality. Visual effects relate to the appearance of such changes within views and the resulting effect on visual amenity.

8.553 The assessment was informed by a desktop study and a field assessment of local site circumstances, including a photographic survey of the character and visual context of the Project Site and its surroundings, and an analysis of Public Rights of Way, was undertaken between January and April 2020 to gather robust baseline information. A broad Study Area of 8 km was initially adopted, enabling the geographical scope of the assessment to be defined and to provide the wider geographical context of the study. A refinement subsequently took place and a Zone of Theoretical Visibility (ZTV) for the proposal was produced across the 6 km Study Area to aid understanding of the potential geographical extent of visual effects and help define a more detailed Study Area. The extent of this detailed Study Area is 2 km from the Project Site boundary, although occasional reference is made to features beyond this area where appropriate.

8.554 A total of 74 representative viewpoints were identified in the ZTV for the Project Site. These viewpoints are at locations where there are likely to be sensitive visual receptors, including receptors in designated landscapes such as Kent Downs Area of Outstanding Natural Beauty (AONB) and those on PRoWs and at residential properties. These viewpoints formed the basis of the visual assessment, the significance of any effect being assessed in terms of the magnitude of change in the view and the sensitivity of the visual receptor and were subject to consultation with appropriate stakeholders.

Statutory landscape designations

8.555 The *LVIABR* identifies that no part of the Project Site falls within or adjacent to specified statutory landscape designations such as National Parks, the Broads or Areas of

Outstanding Natural Beauty (AONB). The Kent Downs AONB is a nationally designated landscape, but the boundary lies approximately 5.1 km south east of the Project Site.

Metropolitan Green Belt

8.556 The vast majority of the Project Site is not located within Green Belt, however, the southern extent of the Kent Project Site which primarily encompasses a section of the A2 and A296 main roads is located within the Metropolitan Green Belt which surrounds the fringes of London.

8.557 The *LVIABR* identifies that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, with the essential characteristics of Green Belts being their openness and permanence. As such, the *LVIABR*, recognises that Green Belt is a spatial planning policy designation rather than a landscape designation based on landscape character and value (i.e. green belts are not necessarily automatically of high landscape value).

8.558 The *LVIABR* has also had regard to the presence of heritage assets which can, in certain instances, inform landscape value. Without duplicating the assessments contained within cultural heritage matters, the *LVIABR* considers the relative merits of Registered Parks and Gardens, listed buildings, conservation areas and Scheduled Ancient Monuments. Equally, the LVBR identifies ecological designations which, although not landscape designations can, on occasion, serve to influence the character of landscapes. Furthermore, the *LVIABR* considers Tree Preservation Orders and Ancient Woodland and Rights of Way and Access.

Assessment and predicted effects

8.559 As with all permanent forms of development, there is a recognition that the Proposed Development is likely to considerably and permanently change the existing landscape of the Swanscombe Peninsula. The expectation of change through the establishment of built form across the Swanscombe Peninsula has been noted given the allocations found within existing development plan documents supporting the principle of some form of development on parts of the Peninsula.

8.560 For the purposes of the EIA, the *LVIABR* is then accompanied by *Schedule of effects: construction* (document reference 6.2.11.2) and *Schedule of effects: operation* (document reference 6.2.11.2) of the London Resort.

8.561 The most notable landscape effect as a result of the Proposed Development would be the change in character from a mosaic of marshland, scrub, cleared brownfield land, former quarries, industrial works and disused industrial works to a global entertainment resort and associated infrastructure across much of the Project Site, especially the Kent Project Site. Other potential effects include the removal of sections of hedgerow and trees to allow for access and layout, together with the planting of new hedgerows and trees to strengthen the structure of the landscape.

8.562 During construction, the main potential likely significant effects are expected to include matters relating to security set-up, the removal of vegetation associated with site

preparation and clearance works, land re-profiling and grading, tunnel constructions through the chalk spines, storage and compound areas, batching plant, re-provision of utility infrastructure and transport infrastructure.

8.563 The *Schedule of effects: Construction* (document reference 6.2.11.2) identifies a significant effect on four identified landscape resources, being the Marshland Local Landscape Character Area (LLCA), Chalk Pits LLCA, Western Thames Marshes Kent Landscape Character Assessment (LCA) and Botany Marshes LCA. All other landscape resources would not experience any significant effect. Significant effects are expected during construction across a number of the photo viewpoints (PVP1, 2, 3, 4, 5, 7, 9, 11, 12, 13, 14, 17, 18, 20 (residential receptors only), 22, 23, 24, 26, 27, 29, 30, 31, 37, 40, 46, 51, 53, 54, 56, 58, 60, 66, 67, 68, 70, 71 (recreational river uses only) and 72).

8.564 Once the Proposed Development is complete and operational, the main potential likely significant effects are expected to include matters relating to the change in land use and character, introduction of permanent built features and infrastructure, increased movement across the Project Site (vehicular, people etc.), increased light pollution and removal of landscape features and existing structures across the Project Site.

8.565 The *Schedule of effects: Operation* (document reference 6.2.11.3) identifies the predicted effects during operation, both at Year 1 and at Year 15 once the Proposed Development is established and landscape has matured. The document identifies the same landscape resources as having significant effects as during construction. All other landscape resources would not experience any significant effect. In terms of effects from the photo viewpoints, in Year 1, significant effects are expected at a number of these (PVP1, 2, 3, 4, 5, 7, 9, 11, 12, 17, 18, 20 (residential receptors only), 22, 23, 24, 26, 27, 29, 30, 31, 37, 39 (NCR only), 40, 46, 53, 54, 55, 56, 60, 66, 67, 68, 70 (recreational river users only), 71 and 72).

8.566 In terms of effects from photo viewpoints in Year 15, significant effects are expected to remain at a number of these (PVP1, 2, 3, 4, 5 (residential receptors and PRoW users only), 7, 9, 11 (residential receptors only), 12, 17 (residential receptors only), 18, 22, 23, 26, 27, 29, 30, 31, 37, 40, 53, 54, 60, 66 (recreational river users only), 67 (recreational river users only), 68 (recreational river users only), 70 (recreational river users only), 71 (recreational river users only) and 72). During operation, it is considered that the landscape and visual effects would be limited initially and further reduced with increasing maturity of the London Resort.

Metropolitan Green Belt

8.567 The impact of the proposed new fly-over across the A2(T)/B259 junction and exit route to merge with the existing slip road onto the A2 on the openness of the Green Belt was considered, concluding that given the small area of land potentially affected and the limited nature of the works, effects upon the spatial nature of the Metropolitan Green Belt designation is minor.

8.568 The Proposed Development along the Access Corridor is likely to reinforce the existing landscape character of Ebbsfleet Valley through which it runs. Parts of the A2(T) Corridor landscape are likely to experience more minor changes due to the A2(T)/B259 junction improvement works. Taking into account the proposed landscape and visual mitigation strategies, it is anticipated that the new road and junction improvement works would be successfully integrated into the landscape without significant adverse effects and similar in nature to the baseline scenario. The landscape and visual impact of the Access Corridor is likely to be relatively localised. Similarly, the effects upon the openness and permanence of the Green Belt are not expected to be affected.

Mitigation

8.569 In terms of ensuring that the impacts upon the landscape are acceptable, a number of landscape and ecological mitigation strategies are identified such that it is considered that the overall residual effects upon the landscape fabric and features of the Swanscombe Peninsula would be beneficial, including retention and enhancement of existing areas of ecological habitats such as marsh, reeds and grassland as well as creation of newer areas.

8.570 Following the *LVIABR*, a *Landscape Strategy* (document reference 6.2.11.7) has been prepared, identifying constraints and opportunities to protect and enhance green infrastructure network across the Project Site as part of mitigating significant effects where appropriate arising from the Proposed Development. A strong framework of green infrastructure will be delivered across the Project Site incorporating hedgerow and woodland planting as well as enhancements to marshland and saltmarsh. Creation of public open space that will include connectivity to the landscape beyond the Project Site will also bring a number of biodiversity, landscape and recreational connectivity benefits.

Landscape Strategy

8.571 A *Landscape Strategy* (document reference 6.2.11.7) accompanies the application. The document identifies the context within which the Project Site sits. How the landscape strategy interfaces with the wider masterplan is also presented in the *Design and Access Statement* (document reference 7.1).

8.572 The *Landscape Strategy* takes the Project Site and its context and recognises landscape character areas which help to identify the variations in character across the local area as well as the similarities and connections. The *Landscape Strategy* features both hard and soft landscapes, including amenity water features such as ponds and watercourses. The landscaping has been given significant attention as it will provide the setting for rides, attractions and amenities within the Leisure Core but also how the Proposed Development integrates with the surrounding land uses, principally the natural landscapes and habitats across the Swanscombe Peninsula. At noted within Chapter 3: *Project description* of the ES (document reference 6.1.3), in general the *Illustrative Masterplan* (document reference 2.21) seeks to work with the grain of the existing terrain but where necessary, the Landscape Strategy uses earth shaping to create the particular landscape required for the Leisure Core and to provide a flood resilient design. This is shown in the *Illustrative Landscape Plans* (document reference 2.20). The *Illustrative Landscape Plans* set out the

range of landscape typologies proposed across the Project Site, ranging from habitat enhancements and ecologically focused proposals around the marsh areas to the landscape intent around the Leisure Core where a different character is necessary to reflect the sense of a global entertainment resort.

8.573 The London Resort landscape will be integrated into the existing marshland landscape, using natural features to create a multi-functional, interconnected, biodiverse environment across the peninsula and across the wider application area.

8.574 The *Landscape Strategy* sets five principal objectives:

- A destination landscape;
- A biodiverse landscape;
- A resilient landscape;
- An accessible landscape; and
- A historic landscape.

8.575 The *Landscape Strategy* details how these principals have been incorporated into the different areas of the London Resort. The landscaped areas include three main 'zones' known as the marsh landscapes, Resort landscapes and infrastructure and back of house. Brief commentary on each of these is set out below. The *Landscape Strategy* considers opportunities within each of the three zones, including more refined areas within the zones.

Marsh landscapes zone

8.576 The marsh landscapes comprise the natural landscapes at Black Duck Marsh, Broadness Marsh and Botany Marsh. The *Landscape Strategy* notes that the Swanscombe Peninsula landscape will be enhanced through water quality and habitat enhancements as well as improved public access, connectivity and facilities. A detailed habitat enhancement and management plan aims to interrupt the current ecological succession to maintain open mosaic habitat on the Peninsula as well as grassland and scrub. It is noted that water quality and wet habitat will also be improved with an upgraded leachate treatment system, a new system of reedbeds and ditches, ponds and scrapes as well as an extension to the salt marsh habitat around the edge of the Peninsula. Public footpath and cycle connections will be enhanced and improved including the routing of the England Coast Path as well as public access facilities comprising board walks, bird hides and seating areas.

London Resort landscapes zone

8.577 The *Landscape Strategy* identifies that the London Resort landscapes are made up of the sequence of arrival spaces to the London Resort, outside the payline. These include the terminals at the Port of Tilbury and the London Resort Ferry Terminal at the River Thames, Ebbsfleet International Station and the interchange terminal and parking areas. It includes

a number of public plazas and landscaped spaces which provide for the visitor an exciting experience upon entering the London Resort, with new tree and shrub planting, water features, canopy structures and paved areas.

Infrastructure and back of house zone

8.578 This zone includes designs for the London Resort Access Road leading up to the London Resort from its junction with the A2(T). It also includes the back of house areas within Gate One and Gate Two, the staff accommodation within the Claylands Lane Pit and other utilities and services in the Sports Ground Pit and Bamber Pit.

Habitat strategy

8.579 The habitat approach within the *Landscape Strategy* is informed by the ecological surveys and mitigation discussed in previous sections of this chapter. Key design principles include:

- Black Duck Marsh and Botany Marsh (east) will be enhanced through a targeted management regime.
- A reedbed will be created to form the new northern buffer to Gate One, filtering grey water and stormwater run-off from the Leisure Core.
- Extended Salt Marsh habitats will be formed along the edge of the River Thames through the re-profiling of banks and retired flood defences.
- Scrub mosaic of buckthorn, blackthorn and grassland on Broadness Marsh will be retained and enhanced through a new management regime.
- Connecting woodland, meadow and wetland habitat will be created within Gate One and Gate Two to allow wildlife corridors through the London Resort enhancing the Green Infrastructure, biodiversity and amenity value.
- Roofscapes will also be used for habitat creation, green and brown roofs adding to the diversity of habitat within the London Resort, particularly for invertebrates.
- Craylands Lane Pit will also be enhanced with an appropriate management regime to maintain the grassland species particular to the limestone habitat present at the site while targeted management of Sports Ground Pit and Bamber Pit will aim to maintain increased diversity in these areas.

Blue infrastructure strategy

8.580 The blue infrastructure strategy proposes the following design principles:

- A network of drainage ditches cross the Peninsula and form distinct edge conditions along marshland areas, retained wherever possible;

- A new 'Reedbed Channel' will be created along the northern and eastern boundary of Gate One, draining surface water run-off and forming a connected hydrology with Broadness Harbour and Botany Marsh (east);

- Reedbeds provide a variety of ecosystem services, providing an ideal environment for treating wastewater, reducing contamination, raising water quality and enhancing biodiversity through the formation of connected habitats.

- Rain Gardens will soften the plaza and interchange areas within the London Resort arrival space and create space for tree planting. They will also form part of the connective natural green infrastructure within Gates One and Two.

- Swales within the Gates will manage the flow of surface water, provide wet habitat and natural security to the perimeter.

- The 'Main River' will be diverted alongside the London Resort road through the development and discharge into Black Duck Marsh.

Accessibility strategy

8.581 The accessibility strategy proposes the following design principles:

- Sustainable modes of transport and local community connectivity with pedestrian and cycle access forming a key part in the access plan.

- Utilising Pilgrims' Way as the primary pedestrian/cycle route connecting Swanscombe to the London Resort and through to the ferry terminal.

- A network of way-marked routes will provide pedestrian and cycle access around the natural areas of the Peninsula (comprising existing and diverted PRoWs along new route alignments) and including the England Coastal Path.

- Informal 'Nature Trails' in the northern-most part of Broadness Marsh where access will be limited to reduce disturbance to wildlife.

- New board-walks and bird hides will provide safe access within the marsh areas and along the River Thames with clear 'wildlife only' areas maintained.

- Resort-wide way-finding strategy to provide clear directional guidance and orientation information for all, developed with all users in mind.

Public facilities strategy

8.582 The public facilities strategy proposes the following design principles:

- Two Bird Watching Towers provided within the marshes to encourage wildlife enthusiasts whilst reducing disturbance to wildlife;

- Viewing Platforms at high level vantage points on the chalk cliffs, and on the River Thames edge, allow visitors to engage with the river more directly and enjoy panoramic views.

- The existing amenity space within Botany Marsh (east) will be retained for use as a picnic area and for informal recreation usage.

- A riverside walk and fitness/play trail is proposed along the more active western side of the Peninsula between the super pylon and Ingress Park residential area. Other areas are intended to be more tranquil and passive landscapes.

- Seating will be integrated in areas where flood defences form an edge to pathways to allow for rest and relaxation as well as informal play opportunities.

Natural Security

8.583 In addition to man-made security measures, such as the erection of comprehensive physical fencing structures, perimeter security to the London Resort will also utilise natural security solutions, providing additional level of security while also helping to disguise man-made structures into the landscapes. For example, swales, ditches and reed beds will add natural security measures while and double layered hedgerows with trees to create a green (and generally wet) transition zone between the secure fence and the marshes beyond. This green edge will soften views of the London Resort externally and provide a buffer to noise and light disturbance within the adjacent marsh areas.

Conclusion

8.584 A comprehensive *Landscape Strategy* (document reference 6.2.11.7) has been established, informing the *Illustrative Landscape Plans* (document reference 2.20). Both documents have been developed in close association with the *Illustrative Masterplan* (document reference 2.21) to arrive at fully integrated masterplans that coherently overlay one another. The *Landscape Strategy* sets out the principles of what will be achieved through the Proposed Development, with detailed arrangements to be secured through detailed design stage and requirements that form part of the DCO. The *Landscape Strategy* and *Illustrative Masterplan* both respond to the Project Site's context which has been thoroughly appraised. The proposed landscape of the London Resort and its environs proposed under the DCO is considered high quality, responding to not only the constraints but also identifying opportunities for betterment across accessibility and public facilities.

8.585 The principles portrayed through the *Illustrative Landscape Plans* (document reference 2.20) are therefore considered to accord to paragraph 127 of the NPPF by providing a visually attractive, appropriate and effective landscaping strategy which sympathetically responds to the local character and landscape setting, integrating with the *Illustrative Masterplan* (document reference 2.21) itself. The landscaping proposed would also conform to good place-making principles set out within policies of the development plan documents, enabling the delivery of an integrated strategy that celebrates existing

provisions and delivers integration to the landscape for a variety of purposes, including public access across Swanscombe Peninsula.

ARBORICUTURE

Overview

8.586 The NPPF recognises the important contribution trees can make to landscape and ecological matters, especially where they represent irreplaceable habitats such as ancient woodlands or veteran trees.

8.587 At a local level, policies such as Policy DP25: Nature Conservation and Enhancement of the Dartford Development Policies Plan (July 2017) which seeks to retain existing trees wherever possible, Policy CS12: Green Infrastructure of the Gravesham Local Plan Core Strategy (September 2014) and Policy CSTP18: Green Infrastructure of Thurrock's Core Strategy and Policies for Managing Development (January 2015).

Figure 8-15: Key planning policy relating to arboriculture

National Planning Policy Framework (February 2019)
- Chapter 15: Conserving and enhancing the natural environment

Dartford Development Policies Plan (July 2017)
- Policy DP25: Nature Conservation and Enhancement

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS12: Green Infrastructure

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSTP19: Biodiversity
- Policy PMD7: Biodiversity, Geological Conservation and Development

Ebbsfleet Implementation Framework (2017)
- Throughout

Assessment

8.588 An *Arboriculture Impact Assessment* (AIA) (document reference 6.2.12.9) accompanies the application as an appendix to Chapter 12: *Terrestrial and freshwater ecology and biodiversity* of the ES (document reference 6.1.12).

8.589 Identified within the *AIA* is details of a tree survey undertaken cross the Project Site. The tree survey methodology adopted for the survey was based on guidelines set out in BS 5837:2012 Trees in relation to Design, Demolition and Construction, especially Section 4.4, 'Tree Survey'.

8.590 The survey process recorded a total of 93 individual trees, 93 groups of trees and 13 woodlands. Full attribute details for each item surveyed are provided within the AIA. A number of survey items were also identified as being formally protected by a Tree Preservation Orders (TPO) with five TPOs registered on, or adjacent to the Project Site. These are concentrated to the south west of the Kent Project Site at the location of the A2(T) Bean junction.

8.591 The survey data can be categorised into three specific areas of reference (species diversity, age distribution and grading classification) enabling analysis and a fuller arboricultural appraisal to be undertaken. Of all the surveyed items, just two have been categorised as A and are of high quality while 131 have been categorised as B and are of moderate quality. Both category A and B items should be prioritised for retention where practicable due to their condition, age and retention span. The survey identified 60 category C items of low quality. The survey identified six category U items, the condition of which are considered to be impaired to such an extent that they cannot be realistically retained and require removal irrespective of development.

8.592 The AIA was prepared following site-based observations, a desktop study of the baseline survey data and consideration of the Proposed Development. The AIA assesses the likely impacts of the proposals on the tree stock and where appropriate, provides mitigation with the view of achieving a harmonious relationship between the trees and the built form

8.593 The development has been informed by the arboricultural constraints information presented and the further recommendations contained within to ensure the long-term health of the tree stock. These recommendations relate to root protection areas, proximity to structures.

8.594 The AIA noted that the tree stock within the Project Site is biased towards maturity and would therefore benefit from new planting to ensure succession to the tree stock.

8.595 The AIA includes a tree retention and removal plan.

8.596 This AIA assesses the likely impacts of the Proposed Development on the tree stock and, where appropriate, provides mitigation with the view of achieving a harmonious relationship between the trees and the built form.

8.597 In total, the AIA determines that 50 items are impacted by the development proposals of which 24 are category B, of moderate quality and 26 of the items are category C, of low quality. These are identified for either complete (39) or partial (11) removal. A breakdown of this is summarised in the AIA and reproduced in Table 8-10.

Table 8-10: Summary of tree loss and retention

	Existing Trees, Groups and Hedgerows	Trees, Groups and Hedgerows lost due to Proposed Development	Trees, Groups and Hedgerows affected due to Proposed Development	Trees, Groups and Hedgerows unaffected due to Proposed Development
Category A (high quality)	2	0	0	2
Category B (moderate quality)	131	18	6	107
Category C (low quality)	60	21	5	34
Totals	193	39	11	143

Mitigation

8.598 The AIA identifies mitigation of planting of approximately 6,000 trees as individuals, in the form of street trees planting or amenity open grown forest trees within the Proposed Development or as copses and pockets of woodlands in the open areas within and bordering the Project Site. It is noted this new tree planting will enhance the amenity and ecological value of the Project Site, contribute to the overall Green Infrastructure for the area, ensure diversity of species and age, and secure succession to the tree stock into the long-term.

8.599 The AIA also specifies that existing trees identified for retention on will need to continue to be managed and require implementation of physical protection measures to safeguard the retained trees during the demolition and construction phases.

Conclusion

8.600 The impacts of the Proposed Development upon existing trees and hedgerows across the Project Site has been assessed through an AIA which has identified a total of 193 items. The AIA concludes there will be a total loss of 39 trees, groups and hedgerows, all within Category B and C and none within Category A. A further 11 items will be affected by the Proposed Development, again all wither Category B or C. The remaining 143 items will be unaffected by the Proposed Development. Given the significance and scale of the proposals, the impact upon the existing stock is considered negligible. When considered alongside the proposed mitigation involving the planning of approximately 6,000 trees the Proposed Development offers significant opportunities for the betterment of tree provision within the London Resort. The tree planting is a component of the overall landscape strategy deployed across the London Resort, as described within the *Landscape Strategy* (document reference 6.2.11.7).

8.601 The *Landscape Strategy* has responded to the important contribution trees can make to both landscape and ecological gains, therefore seeking to align the arboricultural approach to that sought within the NPPF and through local development plan policies.

NOISE AND VIBRATION

Overview

8.602 The NPS for National Networks (December 2014), at paragraph 4.79, notes that road networks have the potential to affect health through, amongst other matters, noise and vibration. Paragraphs 5.186-5.200 consider in further detail the assessment, decision-making and mitigation of noise impacts.

8.603 Paragraph 180 of the NPPF relates to noise and seeks to ensure that new development is appropriate for its location, including mitigating and reducing to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

8.604 In addition, policies within development plan documents seek to ensure new development does not result in unacceptable material impacts in respect of noise and vibration. The principle policy within the Dartford Development Policies Plan (July 2017) is considered to be Policy DP5: Environmental and Amenity Protection and in the Gravesham Local Plan Core Strategy (September 2014) it is Policy CS19: Development and Design Principles. Policy PMD1: Minimising Pollution and Impacts on Amenity of the Core Strategy and Policies for Management of Development (January 2015) relates to noise.

Figure 8-16: Key planning policy relating to noise

NPS for National Networks (December 2014)
- 5.186-5.200

National Planning Policy Framework (February 2019)
- Chapter 15: Conserving and enhancing the natural environment

Dartford Development Policies Plan (July 2017)
- Policy DP5: Environmental and Amenity Protection

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD1: Minimising Pollution and Impacts on Amenity

Identification of sensitive receptors

8.605 Source-Pathway-Receptor analyses has been undertaken, providing an assessment of the potential noise impact during both the construction and the operation of the Proposed Development upon sensitive receptors.

8.606 Sensitive receptors are located where noise or vibration can have a negative impact on humans, wildlife or ecologically sensitive sites in the vicinity of the Project Site as well as the same receptor types located along roads leading to the Project Site and therefore affected by the construction and operation of the Proposed Development. The following categories of noise sensitive receptors have been considered:

- Residential;
- Education and research facilities;
- Healthcare and care home facilities; and
- Ecological sites.

8.607 Chapter 16: *Noise and vibration* of the ES (document reference 6.1.16) provides full identification of the noise sensitive receptors at both the Kent and Essex Project Sites.

8.608 Noise surveys were undertaken at selected locations around the Kent Project Site and the Essex Project Site on the dates identified in Table 8-11.

Table 8-11: Noise surveys

Date	Kent Project Site	Essex Project Site
9 December 2014	Y	N
5 March 2015	Y	N
23 July 2015	Y	N
13 March 2020	Y	Y

8.609 Owing to the previous assessments, there is considered a reliable and informative background evidence base. Only one set of survey information, from March 2020, is available for the Essex Project Site, given its recent inclusion in the Order Limits. Further surveys after March 2020 have not been possible as a result of the COVID-19 pandemic resulting in baseline positions which are not considered representative.

8.610 The following paragraphs seek to summarise the findings of the impacts of noise and vibrations during construction and operation.

Assessment

8.611 A detailed assessment of noise and vibration implications is provided within Chapter 15: *Noise and vibration* of the ES (document reference 6.1.15). Noise and vibration can arise from groundworks, piling, vehicles and machinery during the construction stage, and from sources including traffic, theme park rides and outdoor events such as parades during the operation of the London Resort. The detailed noise assessment was undertaken to gain an understanding of the existing baseline noise climate conditions through modelling.

Construction

8.612 Dwellings within close proximity to the Kent Project Site boundary are expected to be affected to a degree during construction activities, due to the short distance to the works and the characteristics of construction noise making it more readily discernible against the existing noise climate. Mitigation measures that could be used to reduce noise levels at receptor locations where reasonably practicable are set out in detail in Chapter 15: *Noise and vibration* of the ES (document reference 6.1.15) and are controlled through the *CEMP* (document reference 6.2.3.2) and the *CMS* (document reference 6.2.3.1).

8.613 Noise from construction around the Essex Project Site is likely to be insignificant against the existing background noise levels and noise character of the local area.

Operational

8.614 The noise assessment considers the effect of road traffic noise and the impact due to 'ride and scream' noise from operation of the Proposed Development that is visitors on rides while operational. Given the surrounding context, it is proposed Gate One will accommodate a greater number of outdoor rides. A total of six outdoor rides have been modelled within Gate One. A further three outdoor rides have been modelled in Gate Two along with a series of 'black box' (indoor) rides. This is in line with the *Illustrative Masterplan* (document reference 2.21) of the Proposed Development and consistent with the parameters being assessed. Efforts have been made to concentrate the majority of the outdoor rides within Gate One and therefore furthest from the residential sensitive noise receptors. There is a need to ensure outdoor rides are capable of being delivered within Gate Two however the greater use of black box rides will help reduce any impact. The benefits of black box rides are the significant containment of noises arising from the mechanical operation of the rides but also the 'ride and scream' noises.

8.615 The assessment has determined that if the operational mitigation measures are implemented, residual effects are likely to be reduced to negligible or minor adverse impacts at existing sensitive receptors.

8.616 Given the distance between the Proposed Development and any nearby residential properties, the development proposals will not have any material impact upon amenity in relation to noise. Taking into consideration the above observations regarding the distance between the application site and neighbouring residents and the imposition of appropriate requirements to mitigate the noise arising from rides and attractions at the

London Resort, the proposals will not have an adverse impact upon the amenity of nearby occupiers and would comply with policy and paragraph 180 of the NPPF.

8.617 Noise from the Kent Project Site has been assessed and is not considered likely to propagate across the River Thames to cause any material noise impact on the northern side of the River Thames. Although open the River Thames, even at its narrowest point, remains some 650m wide around the Swanscombe Peninsula.

Conclusion

8.618 The Proposed Development is therefore considered suitable in terms of noise and planning, and acoustic concerns are not considered to represent any barrier to development. The Proposed Development is therefore considered to accord to paragraph 180 of the NPPF and relevant development plan policies.

OPERATIONAL WASTE

Overview

8.619 The NPPF, at paragraph 8, identifies, amongst other matters, the importance of minimising waste and pollution to achieve the environmental objective of sustainable development.

8.620 At a regional level, KCC is the waste planning authority for the area. Policies within the Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020) include Policy CSW 2: Waste Hierarchy which seeks to ensure compliance with the waste hierarchy and Policy CSW 3: Waste Reduction which requires all new development to minimise the production and manage waste. Policy DM13: Transportation of Minerals and Waste amongst other matters seeks to prioritise non-road modes for the transport of waste.

8.621 At a local level, various policies within the development plan seek to promote sustainability, with one strand being the application of the waste hierarchy and the reduction of waste.

Figure 8-17: Key planning policy relating to operational waste

National Planning Policy Framework (February 2019)
- Chapter 2: Achieving sustainable development

Dartford Development Policies Plan (July 2017)
- Policy DP2: Good Design in Dartford

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)

- Policy CSTP29: Waste Strategy

Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020)

- Policy CSW 1: Sustainable Development
- Policy CSW 2: Waste Hierarchy
- Policy CSW 3: Waste Reduction
- Policy DM13: Transportation of Minerals and Waste

Assessment

8.622 LRCH recognises that the nature and scale of operations associated with a global entertainment resort with an estimated 12.5m visitors per year from maturity (2038) will generate substantial volumes of waste. Indeed, it is estimated that, at maturity in 2038, approximately 22,500 tonnes of waste will be generated through the London Resort's operations every year, as discussed in Chapter 19: *Materials and waste* of the ES (document reference 6.1.19). LRCH has recognised this from the outset and sought to establish the principles of a strategy that will seek to appropriately and positively respond to the waste hierarchy which encourages reduction, reuse, recycling and disposal of waste to divert waste from landfill and maximise recycling. Accordingly, an *Outline Operational Waste Management Strategy* (OOWMS) (document reference 6.2.19.1) accompanies the application.

8.623 The *OOWMS* provides an outline strategy that will be developed as the London Resort progresses through detailed design stages. It outlines appropriate measures to minimise, collect, transport, store, recycle and treat the waste expected to be generated through the operation of the London Resort. The *OOWMS* also lays out measures and innovations to incorporate the 'Circular Economy' approach and facilitate a closed loop to operational waste management.

8.624 The circular economy and waste prevention measures proposed within the *OOWMS* include:

- Facilitate staff, guests and visitors in making sustainable choices and to move beyond the traditional linear approach of 'make, use, dispose', with a circular economy model being promoted'
- The prevention and/or limitation of conventional waste generation through green procurement practices by the London Resort and all franchises;
- Product procurements at all stages of product packaging design; and
- Enabling the effective segregation and recycling of materials.

8.625 Specific examples of waste reduction measures are identified within the *OOWMS*.

8.626 The *OOWMS* will be a 'live' document that is updated to reflect further advances in the design of Gate One and Gate Two such that the principles set out within the strategy are more refined and capable of identifying specific operational implementation tools.

8.627 A dedicated waste management facility is proposed, located close to the ferry terminal on the north-western edge of the Swanscombe Peninsula. This plant will contain a materials recovery facility (MRF), an anaerobic digestion plant and ancillary offices. Its location is intended to facilitate the removal of waste and recyclable materials by barge, taking advantage of the established range of riverside waste handling infrastructure along the River Thames.

Conclusion

8.628 Owing to the nature of a global entertainment resort, the Proposed Development is expected to generate significant volumes of waste during its operational activities. Through its ambitions to be one of the most sustainable entertainment resorts in the world, LRCH has sought to ensure the principles surrounding the waste hierarchy are to be adopted and enforced from an early stage. The *OOWMS* sets out the principles of how LRCH seeks to reduce the impacts of its operations through the waste hierarchy, seeking to reduce, reuse and recycle to ensure, as far as possible, waste is diverted from landfill and recycling maximised. In adopting these principles, which will be subject to review, the Proposed Development is considered to accord to the environmental objectives of the NPPF and waste policies identified at a regional level through the Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020) and at a local level.

AMENITY

Overview

8.629 Paragraph 180 of the NPPF seeks to ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Project Site or the wider area to impacts that could arise from the Proposed Development. Paragraph 182 considers the 'agent of change' principle, requiring that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

8.630 Within the local development plan, policies exist seeking to protect the amenity of existing and future occupiers. There is evidence linking the quality of physical spaces and other components of neighbourhood amenity to health and wellbeing, thus demonstrating a degree of interrelationship with the health section of this chapter.

Figure 8-18: Key planning policy relating to amenity

National Planning Policy Framework (February 2019)
- Chapter 15: Conserving and enhancing the natural environment

Dartford Development Policies Plan (July 2017)
- Policy DP5: Environmental and Amenity Protection

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020)
- Policy DM11: Health and Amenity

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD1: Minimising Pollution and Impacts on Amenity

Ebbsfleet Implementation Framework (2017)
- Page 36

Assessment

8.631 Some of the closest existing residential properties are found on Vaughan Avenue to the west of Gate Two, All Saints Close to the south east of the Visitor Centre, residential properties in northern Swanscombe south of the North Kent Line and the residential properties on the southern side of Galley Hill Road and beyond to the south of the back of house area of Gate One. Industrial and commercial uses are found alongside the eastern boundary to the east of Manor Way/Lower Road.

8.632 Consideration and regard have also been given to the introduction of residential land uses, as a sensitive receptor, within Craylands Lane Pit through the introduction of staff accommodation. The agent of change principle has also been considered in this regard, but the surrounding context to Craylands Lane Pit outside of the Order Limits is residential.

Noise and vibration

8.633 Matters relating to noise are discussed elsewhere within this Statement and Chapter 15: *Noise and vibration* of the ES (document reference 6.2.15) and need not be repeated at length here. The London Resort will include a number of noise generating activities, both directly associated with the operation of rides and attractions within the Leisure Core and other areas, but also through support operations and transport movements.

8.634 Subject to appropriate mitigation, controlled through requirements within the DCO, the Proposed Development can demonstrate compliance with the thrust of the NPS for

National Networks, the NPPF and local development plan policies in that the resultant noise and vibration impacts are not significant.

Artificial light

8.635 Matters relating to the *Lighting Statement* (document reference 7.9) are discussed elsewhere within this Statement and need not be repeated at length here. The nature of the London Resort is such that artificial lighting will be used to assist in delivering an important visitor experience. Artificial lighting is an important aspect of the sensory experience when visiting a global entertainment resort and ensure the London Resort is appealing both during daytime hours and evening hours. In respect of amenity considerations, owing to the separation distance and the careful control and design of artificial lighting elements during the detailed design stage, to be controlled via requirements, there is not expected to be any material adverse impact to residential amenity as a result of light pollution. In addition to residential and neighbouring amenity considerations, LRCH recognise the importance of a carefully designed and operated lighting strategy owing to ecological and navigational risk sensitivities. These issues are well understood and further demonstrate the importance of operating a sensitively designed lighting scheme.

8.636 Subject to appropriate design and control of any resultant lighting scheme through requirements within the DCO, the Proposed Development can demonstrate compliance with the NPPF and local development plan policies such as Policy DP5: Environmental and Amenity Protection and Policy CS19: Development and Design Principles.

Overshadowing and overbearing

8.637 As noted in previous sections, the masterplanning approach has sought to ensure an appropriate design response by locating parts of the Proposed Development in positions whereby their impact and effect is minimised, while delivering on the project brief. The result is the Proposed Development, even when considering the parameter approach and the defined envelopes, will not result in any overshadowing or overbearing upon other properties as, wherever possible, the 'fringe' of the Proposed Development has sought to sensitively address its boundary context. The benefit of the Project Site is such that the majority of the built form can be located away from adjoining neighbours, helping to deliver a scheme that, while individually and collectively do represent significant scale, does not interfere or cause a detriment to other properties in this regard. The areas of greatest scale (as demonstrated through the *Parameter Plans* (document reference 2.19)) relate to the Leisure Core and surrounding areas which are located towards the epicentre of the Project Site and thus seeks to represent the areas with the greatest distance from existing premises outside of the Order Limits.

8.638 The western extremity of Gate Two represents some of the closest elements to residential properties, for example Vaughan Avenue located on the western side of Tiltman Avenue. At its closest point, the small back of house area to Gate Two will be presented in a more responsive scale with parameter plans indicating AOD +25m. The parameter plan envelopes then gradually increase as they move to the east, away from the residential

properties. To the east of the Project Site, the back of house area to Gate One is indicated to be AOD +50m and AOD +30m.

8.639 The parameter-led approach will ensure the Proposed Development does not increase in scale or height above that assessed through the EIA. Indeed, as noted previously, it is aspects relating to the need for LRCH to reserve its position for the installation and update of rides and attractions within the Leisure Core which requires maximum flexibility thereby requiring a larger parameter while, for example hotels developments are more known enabling the envelope to have a tighter fit. With the rides and attractions, a large parameter envelope is given to allow for flexibility relating to the layout of roller coasters, for example, which will represent a more 'light weight' structure within the parameter envelop rather than a massing which accommodates the entire envelope.

8.640 In the absence of immediate neighbours next to any part of the Proposed Development which delivers true scale, the proposals are not considered to cause any undue overshadowing or overbearing feel that would materially affect the amenity of neighbouring occupiers, thus complying with the principles of the NPPF and local policies.

Statutory Nuisance

8.641 A *Statutory Nuisance Statement* (document reference 5.2) accompanies the application and provides an account of the potential statutory nuisance implications of the Proposed Development. The document considers both construction and operational matters in respect of emissions, artificial light, noise, insect/rodent infestations and accumulation or deposits of waste.

8.642 The *Statutory Nuisance Statement* identifies that any construction and operational activities that may have the potential to create a statutory nuisance would be suitably controlled and mitigated through the design and operation of the Proposed Development and/or the mitigation measures set out in the *Outline Construction and Environmental Management Plan* (CEMP) (document reference 6.2.3.2) and operational practices deployed by the London Resort.

8.643 With identified mitigation measures in place, it is unlikely that any of the statutory nuisances identified in section 79(1) of the Environmental Protection Act 1990 are predicted to arise during either the construction or the operational phases of the London Resort.

Conclusion

8.644 The benefit of the Project Site selection is that the Proposed Development is set in relatively open grounds with the marshes and River Thames to the north, thus resulting in a form of development that only 'touches' neighbouring uses principally along its southern boundary. The River Thames provides a natural and fundamental separation of the Leisure Core activities from the uses to the north of the river. As noted elsewhere within this Statement, the landscape setting of the London Resort is such it helps provide natural separation and distance to many of the neighbouring residential communities,

commercial and industrial uses. There are, however, areas where the Proposed Development falls closer to the Order Limits and thus is considered a more immediate neighbouring land use to the existing uses.

8.645 The above commentary indicates that the Proposed Development would not have any materially adverse impacts in respect of noise and vibration, artificial light and overshadowing and overbearing. With the appropriate mitigation measures identified, it is considered the London Resort is capable of being an appropriate land use that isn't to the detriment of the amenity of neighbouring occupiers, both residential and commercial in nature.

HEALTH

Overview

8.646 At paragraph 8, the NPPF recognises *'strong vibrant and healthy communities'* are a key aspect of delivering the social objective to sustainable development. Chapter 8 then continues to explore promoting healthy and safe communities through matters such as promoting social interaction, providing safe and accessible places and supporting healthy lifestyles, including safe and accessible green infrastructure and encouraging walking and cycling. Paragraph 98 specifically encourages protecting and enhancing public rights of way and access, taking opportunities to provide better facilities for users.

8.647 At a local level, development plan policies in the round seek to ensure development is only permitted where it does not result in unacceptable impacts to the environment or public health generally, and encourage built form which encourage healthier lifestyles and well-being. Development plan policies identify aspects such as air pollution, noise pollution, contaminated land, odour and light pollution, resulting a degree of overlap with amenity considerations considered elsewhere within this Statement. The delivery of healthy environments is identified as a key theme of the Ebbsfleet Implementation Framework (2017).

Figure 8-19: Key planning policy relating to health

National Planning Policy Framework (February 2019)
- Chapter 8: Promoting healthy and safe communities

Dartford Development Policies Plan (July 2017)
- Policy DP5: Environmental and Amenity Protection

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)

- Policy PMD1: Minimising Pollution and Impacts on Amenity

Ebbsfleet Implementation Framework (2017)

- Pages 15, 23, 26, 31, 36, 49 and 66

Assessment

8.648 The requirement to consider human health in EIA was introduced in the 2017 Regulations, however there is no statutory guidance on assessing health impacts in the context of EIA. Chapter 8: *Human health* of the ES (document reference 6.2.8) is included within the application and recognises that development and planning can play a role in the wider determinants of health and well-being and considers the ways in which the London Resort may affect these determinants and how the London Resort may affect inequalities across different groups in different ways.

8.649 Chapter 8: *Human health* identifies receptor groups include the general population and vulnerable groups, while noting other technical chapters of the ES (such as Chapter 15: *Noise and vibration* (document reference 6.2.15) and Chapter 16: *Air quality* (document reference 6.2.16)) also identify their own sensitive receptors.

8.650 A number of potential health effects both during construction and operation are identified, informed by statutory consultation exercise undertaken during 2020 and the *EIA Scoping Opinion 2020* (document reference 6.2.1.4). The effects are far reaching and cover all broad aspects of the London Resort ranging from displacement or change in access affecting public services and community facilities during construction to the potential health effects associated with the inclusive design, site access and facilities in and around the London Resort and more.

8.651 A wide range of potential adverse health effects are considered within the chapter but in most cases, no significant adverse effects have been identified. The health assessment finds that the London Resort generates significant residual health effects, both adverse and beneficial. These can be summarised as:

- Major adverse effects are anticipated to arise from the displacement of commercial businesses and residential relocation as a result of the Proposed Development.

- Moderate adverse effects are anticipated as a result of the demand for residential accommodation, access to healthcare services and aspects of crime and community safety.

- Moderate beneficial effects are expected through access to work and skills (both during construction and operation), the provision of worker accommodation and the provision of open space.

Displacement of commercial businesses

8.652 Chapter 8: *Human health* of the ES (document reference 6.1.8) notes that there is strong evidence on the positive effects of employment, such as income and social status, along with the adverse health outcomes that are associated with displacement of various commercial uses which result in unemployment. However, it also notes the evidence linking the displacement of commercial uses to health outcomes is considered to be moderate. Nonetheless, employment is a key driver of health, both physical and mental, and there is therefore potential for an adverse health impact for the business owners and their employees due to potential for unemployment resulting from this displacement.

8.653 These effects are expected to reduce in the longer-term with improved health outcomes once individuals are back in employment. LRCH is also seeking to assist in the relocation of displaced businesses through payment of compensation, including enhanced proposals to qualifying claimants, known as the London Resort Premium.

8.654 Matters relating to compulsory acquisition are appropriately addressed within the *Statement of Reasons* (document reference 4.1).

Residential relocation

8.655 The London Resort needs to acquire the three dwellings contained at 19 London Road to construct the visitor centre and also to create an entrance to the London Resort down from Pilgrims' Way. Chapter 8: *Human health* of the ES (document reference 6.1.8) notes that whilst some of the residents may be accepting of the change or it could positively change their living conditions, this effect is conservatively expected to be negative as a result of reduced happiness and disruption caused. The chapter concludes that whilst there are major adverse health effects for the residents of the three dwellings, the quantum of residential displacement and therefore the scale of health effect across the general population of Dartford is considered to be negligible.

8.656 Matters relating to compulsory acquisition are appropriately addressed within the *Statement of Reasons* (document reference 4.1).

Demand for residential accommodation

8.657 Chapter 7: *Land use and socio-economic effects* of the ES (document reference 6.1.7) concludes that the impact of the demand created by the workers and visitors at the London Resort could have negative implications for residents and homes through the pressures placed on the local housing market. This impact would be mitigated to a large extent through the embedded mitigation arising from the on-site staff accommodation (expected to accommodate up to 1,800 staff at any one time) and 3,550 hotel rooms by 2038. However, analysis suggests that this mitigation may not be sufficient and there would be some additional demand placed on the local housing market (which should accelerate residential build out rates).

Access to healthcare services

8.658 There is a recognised potential health effect of construction workers on health services, with increased pressures on the local health facilities with longer waiting times potentially reducing access to health services.

8.659 Chapter 8: *Human health* of the ES (document reference 6.1.8) notes the scale of impact on healthcare services will be reduced as a result of on-site provision. Throughout the duration of the construction period, an on-site health facility will be established to treat minor injuries and ailments and provide preventative healthcare. Overall, the potential health effects related to construction worker health service demand during construction is deemed to have a negligible magnitude on the general population and vulnerable groups.

8.660 With respect to primary healthcare provision, including GP services, it is likely that the workers resident on-site would place the largest burden on services as visitors are not anticipated to register with local GPs. It is anticipated that there will be around 1,800 workers living in the on-site staff accommodation at any one time, based on 2,000 dwellings and a 90% utilisation rate. It is anticipated that these workers would create demand for one additional FTE GP. However, Chapter 8: *Human health* notes the workers who live on site are likely to be younger and would typically be expected to place a lower than average demand on GP services so while they may be registrations, service draw would be expected to be low.

8.661 In order to minimise the burden placed upon local healthcare infrastructure during operation, the London Resort would include an on-site health facility, catering to minor accidents and ailments.

Crime and community safety

8.662 Some theme parks and surrounding amenities and communities have been linked to higher occurrences of crime, in addition to the need for additional measures to ensure the safety of visitors. As noted in previous sections of this Statement, good masterplanning and effective design of the built environment have been embedded so as to reduce the opportunities and number of occasions whereby a crime can occur. The masterplanning and detailed design stages have and will continue to be informed by specialist security advice. The permanent impact for the general population is not anticipated to be significant but the effect is considered to be significant for vulnerable groups.

Access to work and skills

8.663 Chapter 8: *Human health* of the ES (document reference 6.1.8) notes the evidence linking the creation of work and training opportunities to positive health outcomes is considered to be strong, including increased sense of purpose and confidence. As previously noted in this chapter, the London Resort is expected to generate significant levels of employment opportunities, both during construction and when operational. Given the links between employment and health, the work and training opportunities created by the London

Resort will have a positive effect on health. It should, however, be noted that the construction jobs will be temporary in nature and benefit people over a relatively wide geography. Nonetheless, the skills learnt by those employed in the construction of the London Resort will be permanent.

8.664 In respect of operational employment, the work and training opportunities created are anticipated to have a positive effect on health. These health effects are expected over the medium to long term as they are permanent, good quality positions. This topic is discussed further within the *Outline Employment and Skills Strategy* (document reference 6.2.7.7).

Provision of worker accommodation

8.665 As noted in the related housing section of this chapter, provision is sought for the delivery of up to 500 residential dwellings for London Resort staff as part of the DCO application as a result of a direct functional need to ensure the effective operation of the London Resort. The staff accommodation is strictly for use by London Resort employees and will not be available to the general public.

8.666 The London Resort recognises that it will not always be easy for those individuals who are the beginning of their careers to be able to afford to live within the existing community and therefore the provision of up to 500 units of staff accommodation to help address this challenge while offering an incentive that will help attract and retain the best staff.

8.667 Chapter 8: *Human health* of the ES (document reference 6.1.8) concludes the provision of new, high quality staff accommodation will have long term positive impacts on mental and physical health of the staff occupants by reducing the adverse health effects associated with poor quality or insecure housing. In this regard, it is worth acknowledging the staff accommodation will be delivered to meet and exceed the high standards of residential accommodation and amenity expected through local development plan documents.

8.668 Also noted in the related housing section of this chapter is the non-health related benefits of the provision of staff accommodation, namely helping to reduce the demand placed on the local housing market given the scale of the employment associated with the London Resort.

Provision of open space

8.669 Paragraph 98 of the NPPF notes that planning decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. Through careful masterplanning and evolution of the *Landscape Strategy* (document reference 6.2.11.7) and *Public Rights of Way Assessment and Strategy* (document reference 6.2.11.9), overall the Proposed Development will improve access and usability to the open and natural spaces of the marshes across the Swanscombe Peninsula, thus making green infrastructure more accessible to support healthy lifestyles, in accordance with the NPPF.

8.670 The discussion need not be repeated in full here, but the Proposed Development is considered to support healthy lifestyles, including the delivery of safe and accessible green infrastructure and encouraging walking and cycling, through the improvements being made both within the London Resort and its connectivity across the Swanscombe Peninsula which will be available for the public, both visitors to the London Resort and local residents, to enjoy. Accessibility and inclusivity requirements have also informed the Proposed Development to ensure that the resultant built form is accessible to all wherever possible and no groups are excluded. This has been informed by direct engagement with appropriate groups, as discussed in Chapter seven of this Statement.

8.671 As noted elsewhere within this Statement and other technical reports, matters that may be directly associated with adverse impacts upon human health such as air pollution, noise pollution, contaminated land, odour and light pollution are to be appropriately mitigated against, in agreement with statutory consultees, to ensure these are appropriately controlled for the existing and future occupiers affected by the Proposed Development on these topics, for example residential receptor. As such, this requirement of the local development plan policies is considered to be met through identified mitigation measures.

Conclusion

8.672 Strong, vibrant and healthy communities are a key aspect of delivering the social objective to sustainable development. The Proposed Development represents a well-considered built form which provides opportunities for healthier lifestyles and well-being through, for example, improving access and usability to the marshes across the Swanscombe Peninsula, thus making green infrastructure more accessible, in accordance with the NPPF and development plan policies.

8.673 While health impacts aspects are expected to arise, both during construction and operational phases, as assessed within Chapter 8: *Human health* of the ES (document reference 6.1.8), appropriate mitigation is proposed where appropriate to alleviate and minimise the level of impacts.

FLOOD RISK

Overview

8.674 Paragraph 153 of the NPPF sets out the expectations when determining applications for new development including advice on best practice when determining planning applications with regard to flood risk from all sources. Specifically, Chapter 14 of the NPPF provides the framework for decision-making in respect of flood risk, including assessments for flood risk.

8.675 Detailed development management policies are also present within the development plan documents of DBC, GBC, KCC and TC which are similar in tone and content, requiring development to meet the necessary Sequential Test and Exceptions Test when proposed within areas identified as being at risk of flooding.

Figure 8-20: Key planning policy relating to flood risk

National Planning Policy Framework (February 2019)
- Chapter 14: Meeting the challenge of climate change, flooding and coastal change

Dartford Core Strategy (September 2011)
- Policy CS 24: Flood Risk

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS18: Climate Change

Core Strategy and Policies for Management of Development (January 2015)
- Policy CSTP27: Management and Reduction of Flood Risk
- Policy PMD15: Flood Risk Assessment

Ebbsfleet Implementation Framework (2017)
- Pages 36, 51 & 124-128

Assessment

8.676 Detailed consideration of flood risk is set out within Chapter 17: *Water resources and flood risk* of the ES (document reference 6.1.17), *Flood Risk Assessment* (FRA) (document reference 6.2.17.1) and *Surface Water Drainage Strategy* (SWDS) (document reference 6.2.17.2) which accompany the application. These documents should be referred to in full for a detailed appreciation and understanding of maters surrounding flood risk.

8.677 The aforementioned documents identify that the Kent Project Site is situated across all three of the Environment Agency (EA) Flood Zones based on the undefended scenario, with the north of Swanscombe Peninsula being in Flood Zone 2 (medium flood risk), the centre of Swanscombe Peninsula in Flood Zone 3 (high flood risk) and the London Resort Access Road predominantly in Flood Zone 1 (low flood risk). The Essex Project Site is located within Flood Zone 3 benefitting from defences.

8.678 The *FRA* identifies that the Kent Project Site benefits from existing flood defences with a crest level of between 6.31m AOD and 8.8m AOD. The Essex Project Site is currently benefitting from a flood defence with a crest level of between 6.48m AOD and 6.71m AOD.

8.679 The *FRA* notes that both the Kent and Essex Project Sites are situated downstream of the Thames Barrier. The overall current day risk of fluvial and tidal flooding for both the Kent and Essex Project Sites is considered low. Both the Kent and Essex Project Sites are identified as areas with a low risk of groundwater flooding.

8.680 The *FRA* notes that sea level rise and climate change is predicted to have an impact on the extreme water levels within the Thames Estuary. It is likely that these increases in extreme water level will mean that the crest levels of the existing flood defences at both the Kent and the Essex Project Sites will not maintain the same level of protection to the Project

Site for future tidal extreme water levels. Therefore, the future flood risk to the Project Site is identified as being high and requires mitigation.

8.681 This is the conclusion reached within the Strategic Flood Risk Assessments undertaken in respect of the Project Site and the 'in principle' inclusion of the Swanscombe Peninsula within development plan documents for development.

8.682 The *FRA* details how the Proposed Development is complies with the Exceptions Test owing to the significant sustainability and community benefits, including educational and community facilities, which will positively serve the local communities and the London Resort itself.

8.683 A detailed flood risk management strategy is proposed and that, with this in place, the flood risk to the Project Site is low both today and in the future. Analysis of the modelling undertaken as part of the *FRA* has indicated that the Proposed Development has no adverse impacts to flood extents and depths in surrounding areas. Rather, the measures proposed at the Kent Project Site have the additional benefit of improving the standard of protection of the River Thames formal flood defences to 2125 benefitting not only the London Resort but neighbouring developments as well. Furthermore, the FRA indicated that the proposed replacement of the manual flood gates with a passive flood defence embankment reduces the residual risk of failure and increases resilience to future uncertainties. At the Essex Project Site, the surface water drainage strategy proposed has the additional benefit of reducing the flow into the East Dock Sewer, which is currently near capacity. The reduced flow into this channel reduces the risk of the system being overwhelmed during a storm event in the future. The Essex Project Site surface water will be discharged directly into the River Thames via a new independent system for the London Resort.

Conclusion

8.684 It has been demonstrated that, with the identified mitigation and flood risk measures proposed, the flood risks associated with the Project Site, both at the Kent Project Site and the Essex Project Site, can provide appropriate protection to the London Resort both now and, following extensive modelling, into the future.

8.685 With identified mitigation, the London Resort is considered an appropriate form of development upon the Project Site, in accordance with the principles identified within the NPPF and development plan policies, specifically (but without limitation) Policy CS24: Flood Risk of the Dartford Core Strategy (September 2011), Policy DP11: Sustainable Technology and Construction of the Dartford Development Policies Plan (July 2017), Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, Policy CS18: Climate Change, Policy FW3: Managing Flood Risk and Policy FW5: Managing Surface Water Drainage of the Gravesham Local Plan Core Strategy (September 2014) and Policy CSTP27: Management and Reduction of Flood Risk of the Thurrock Core Strategy and Policies for Management of Development (January 2015).

GROUND CONDITIONS

Overview

8.686 Paragraphs 178 and 179 of the NPPF specifically relate to ground contamination and seek, amongst other matters, to ensure that planning decisions are taken such that a site is suitable for its proposed use taking account of ground conditions and any risks arising.

8.687 At a local level, Policy DP5: Environmental and Amenity Protection, Policy CS19: Development and Design Principles and Policy PMD1: Minimising Pollution and Impacts on Amenity all seek to ensure adequate assessments on ground conditions to avoid contaminated land having an adverse impact.

Figure 8-21: Key planning policy relating to ground conditions

National Planning Policy Framework (February 2019)
- Chapter 15: Conserving and enhancing the natural environment

Dartford Development Policies Plan (July 2017)
- Policy DP5: Environmental and Amenity Protection

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD1: Minimising Pollution and Impacts on Amenity

Ebbsfleet Implementation Framework (2017)
- Pages 91 & 124-128

Assessment

8.688 The Project Site is known to include some areas of significant ground contamination as a result of historic activity and industrial uses. This includes the presence of landfill materials and the deposits of Cement Kiln Dust (CKD). LRCH is clear in that it wishes to appropriately and responsibly develop the Project Site in accordance with legislative requirements and best practice to overcome issues relating to ground conditions, in conjunction and following extensive liaison with statutory consultees, including, but not limited to, the Environment Agency, Natural England and Kent County Council.

8.689 A *Contaminated Land Management Strategy* (CLMS) (document reference 6.2.18.9) accompanies the application. The CLMS sets out an overarching strategy such that contamination risks for each of the areas of the Project Site can be identified and managed during phasing of the Proposed Development. The *CLMS* provides a summary of best practice and considers options which correspond to the known and unknown contamination issues across the various areas of the Project Site.

8.690 The *CLMS* identifies a phased approach, as set out in much of the good practice guidance, most recently in the Environment Agency's guidance on Land Contamination Risk Management (LCRM). The CLMS identifies that this phased approach consists of three main stages:

- Stage 1 – Risk assessment (Preliminary, Generic Quantitative, Detailed Quantitative);
- Stage 2 – Appraisal of remediation options (Feasibility, Evaluation, Selection); and
- Stage 3 – Remediation and verification (Strategy development, implementation, verification, long term monitoring & maintenance).

8.691 The *CLMS* notes that, currently, the London Resort is at Stage 1 with respect to the phased process set out above. Accordingly, there is currently uncertainty with respect to the precise description of the various sources of contamination across the Project Site, the receptors that could be affected and the pathways that link them. It is intended these uncertainties will be reduced or resolved by a substantial programme of ground investigation planned to commence in 2021 and agreed with the relevant statutory consultees.

8.692 Although not related to land affected by contamination, there are ground related constraints related to the existing High Speed 1 (HS1) and the London Resort Access Road corridor that must also be taken into account.

Potential contamination sources

8.693 The *CLMS* identifies potential contamination sources from former uses of the Project Site and neighbouring area. The *CLMS* provides a summary of these matters which are described in a number of accompanying desktop reports undertaken. In summary, across all areas of the Project Site, identified sources comprise:

- Made Ground (from many and various past and recent industrial and commercial activities);
- Landfill / waste materials (Domestic, commercial, mining and manufacturing wastes, including CKD);
- Process wastes etc. (e.g. from sewage treatment, paper and cement manufacture, tar distillery, whiting & chemical works, light industry, railway sidings, petrol station, electricity grid and sub stations; and
- Hazardous ground gas (from both landfill wastes and natural soils).

8.694 The *CLMS* notes that, in addition, there is also a potential for Unexploded Ordnance (UXO) on both Essex and Kent Projects Sites, where risks and mitigation are subject to separate consideration.

Source-pathway-receptor linkages

8.695 The *CLMS* identifies receptors (human health, ground water, surface water, environment and built environment) and associated pathways. Source-pathway-receptor linkages have been identified, considered and the results of the Preliminary Risk Assessments relevant to the Proposed Development are presented.

Remediation

8.696 The overall aim of the remediation is to ensure that potential risks from land contamination in all areas of the Project Site to all these receptors are appropriately mitigated

8.697 The *CLMS* identifies the potential risks to groundwaters, surface waters and flora and fauna during both construction and operation of the London Resort. It identifies mitigation measures which will be adopted and progressed within the Construction Environmental Management Plan (CEMP).

8.698 The *CLMS* also identifies additional local remediation requirements, over and above the Remediation Strategy, required. No such additional local requirements are anticipated for the Essex Project Site, however additional measures are required at the Kent Project Site as a result of the widespread occurrence of CKD, the presence of a leachate collection and management system over particular areas of the Kent Project Site and the presence of areas subject to Environmental Permits.

Conclusion

8.699 It is considered that, subject to appropriate wording of requirements, that matters relating to ground conditions can be appropriately addressed. Through the use of additional investigations, appropriate mitigation measures, enforced through requirements and other licencing arrangements, the Proposed Development will be compliant with the NPPF such that a site is suitable for its proposed use taking account of ground conditions and any risks arising. The Proposed Development will deliver an appropriate land use upon a difficult and complex contaminated site, helping to maximise the beneficial use by introducing a viable development proposal.

CONSTRUCTION

Overview

8.700 The NPPF is largely silent on the specific matter of construction activities. However, matters relating to construction should generally be considered against the thrust of the content of the NPPF in respect of seeking sustainable delivery and reducing impacts in the broad sense of the term, for example environmental and social impacts.

8.701 At a local level, policies within development plan documents also seek to ensure appropriate construction activities that minimise their impacts.

Figure 8-22: Key planning policy relating to construction

Dartford Development Policies Plan (July 2017)
- Policy DP11: Sustainable Technology and Construction

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS19: Development and Design Principles

Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020)
- Policy CSW 3: Waste Reduction

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD12: Sustainable Buildings

Assessment

8.702 The scale of the London Resort is such that the construction activities associated with it are considerable. The following matters are considered within this section:

- Construction workforce;
- Construction traffic;
- Construction environment; and
- Construction waste.

Construction workforce

8.703 A *Construction Workforce Accommodation Strategy* (CWAS) (document reference 6.2.7.8) accompanies the application. The document identifies that up to 5,000 construction workers are expected on-site in the peak year of Gate One construction (2023) and 850 during the peak year of Gate Two construction. LRCH is seeking to maximise local recruitment of the workforce, as set out in the *Outline Employment and Skills Strategy* (document reference 6.2.7.7). Of these, however, approximately half are expected to live too far from the site to commute daily and will require temporary accommodation close to the Project Site. The *CWAS* seeks to ensure that the additional demand generated by these non-home based workers will not place excessive pressure on existing accommodation markets.

8.704 The *CWAS* assesses the existing stock in the Core Study Area (CSA), comprised of the local authorities of Dartford, Gravesham and Thurrock, to estimate the total room stock across tourism accommodation (serviced, non-serviced and campsites), the private rented sector (PRS) and the owner-occupied sector (OOS).

8.705 Comparing the peak workforce requiring temporary accommodation (2,500 in 2023 and 850 in 2028) with the available and affordable rooms in the CSA (5,400), it is clear that the local market is highly constrained. Given this, the *CWAS* strongly advises that the London Resort provide on-site accommodation to mitigate impacts of the additional demand on the local accommodation markets. The *CWAS* outlines three preliminary options:

- Rely on existing accommodation options;
- Purchase or rent a decommissioned cruise ship (likely with 1,000 to 2,000 room capacity) to be docked at the Port of Tilbury; and/or
- Locate mobile homes (500-700 rooms) at the Project Site.

8.706 The *CWAS* discusses the various advantages and disadvantages of each option but, overall, concludes that a combination of options, with the cruise ship and on-site mobile homes providing substantial relief for the local market.

8.707 The *CWAS* discusses the approach to the effective management and monitoring of construction workforce accommodation, including an accommodation matching service (either through key appointed personnel or an online hub) to provide a one-stop-shop that accommodation providers can list their offer on, and ensures that workers can select accommodation best suited to their needs. The take-up of various accommodation will be monitored, identifying any issues or problems as soon as possible. High standards of behaviour will be enforced throughout the workforce through the Workforce Code of Conduct.

Construction traffic

8.708 A *Construction Traffic Management Plan* (CTMP) (document reference 6.2.9.2) accompanies the application as a 'live' document that will be revised and updated during the construction process. The document outlines the likely impacts associated with the construction phase of the Proposed Development during the construction of both Gate One and Gate Two and an overarching plan as to how the construction traffic and site operations will be managed at the London Resort, including hours of operation, traffic routing, safe vehicular access and manoeuvring and construction workforce arrangements with a view to minimising traffic impacts.

8.709 The CTMP provides detailed information concerning construction traffic, including:

- construction vehicle routeing;
- proposed programme and duration;
- number of construction personnel including travel arrangements and mitigation;
- number of construction and delivery vehicles using the public highway; and
- traffic management.

Construction environment

8.710 The *Outline Construction and Environmental Management Plan* (CEMP) (document reference 6.2.3.2) is intended to be more specific and operative, focussed on the environmental management of the construction activities and facilitating the implementation of environmental mitigation measures. For this reason, the CEMP provides a list of mitigation measures, based upon the Environmental Statement, together with other factors considered during their implementation. The overall aim of the CEMP is to reduce the risk of significant effects as a result from the construction phase of the Proposed Development on sensitive environmental resources and minimising disturbance to local residents.

8.711 The CEMP is intended to be a live document, which will be developed further as the scheme of work progresses and once a Principal Contractor has been appointed. The CEMP will be secured through the requirements of the DCO. LRCH will ensure that the Principal Contractor complies with the CEMP via contractual arrangements.

Construction waste

8.712 An *Outline Construction Waste Management Plan* (CWMP) (document reference 6.2.19.2) accompanies the application.

8.713 The CWMP aims to ensure that construction and demolition waste from the Proposed Development is minimised and handled in an environmentally sustainable manner. The CWMP identifies actions taken to design out waste before construction begins and makes recommendations on how waste can be reduced at the construction stage. It is expected the recommendations will be further developed by the Principal Contractor and designated Waste Management Company over subsequent design and construction phases.

8.714 The CWMP estimates the waste types and quantities. It identifies there are significant opportunities to reduce construction and demolition waste arising from the Proposed Development. It sets out a series of recommendations which have the potential to significantly reduce the waste generated from the baseline estimate.

8.715 The CWMS is considered a live document and it will be continually updated throughout the design and construction process.

Conclusion

8.716 The London Resort represents a significant construction project. The nature of all construction projects are such that they provide benefits (such as construction employment opportunities, training and apprenticeships) but can also introduce disadvantages, such as the temporary disruption caused by construction activities relating to matters such as traffic, noise and the generation of substantial volumes of waste.

8.717 The above sections have considered the principles as to how the effects of construction activities will be managed and controlled, to maximise benefits (such as employment

generation and supply chain benefits) while seeking to minimise the negative impacts by ensuring appropriate mitigation is implemented. Appropriate mitigation measures will be identified and deployed to deliver sustainable construction methods while looking to protect environmental assets and the amenity of existing and future neighbouring land uses and occupiers. Subject to the appropriate mitigation measures, it is considered the construction impacts can be suitably controlled and managed.

CONCLUSION

8.718 This chapter has sought to provide a summary of the key issues to be considered relating to the Proposed Development. As noted during the introductions to this chapter, this assessment should be read alongside the full accompanying technical documents referred to for a full assessment and understanding on the issues discussed.

8.719 In the absence of a NPS for business and commercial projects, the review of the proposals against prevailing national and local planning policy undertaken illustrates the compatibility of the Proposed Development with the principles of these policy objectives.

8.720 The assessment identifies that there is significant support toward the principle of the development through the significant economic contribution the London Resort is expected to deliver given its scale and offer. While there is recognition that the Proposed Development involves the displacement of existing businesses and one residential building (comprising three dwellings) from within the Order Limits, the Proposed Development is expected to deliver very significant net economic gain that exceeds that lost through the displacement. When considered alongside the overarching principle of national Government of supporting economic growth through sustainable development, it is considered the principle of the development is well-established.

8.721 Comprehensive assessment has been undertaken with regards to the series of technical assessments to assess impacts arising and identify appropriate and necessary mitigation measures to overcome these, where appropriate and necessary. The above analysis identifies that the Proposed Development is entirely acceptable on technical grounds following appropriate mitigation, as falls to be discussed in Chapter nine of this Statement.

8.722 The conclusion is that the economic, social and environmental benefits as described above are such that the balance falls firmly in favour of making the DCO.

Chapter 9 ◆ Requirements and planning obligations

OVERVIEW

9.1 This chapter outlines how the mitigation identified in the accompanying Environmental Statement and other assessments would be secured and provided for. It also details heads of terms for planning obligations proposed that will be used to effectively mitigate the Proposed Development.

REQUIREMENTS

Overview

9.2 Schedule 2 to the *draft DCO* (document reference 3.1) details the proposed requirements that LRCH must comply with in undertaking the construction, operation and maintenance of the London Resort. Requirements, akin to conditions attached to planning permissions granted under the Town and Country Planning Act 1990, seek to ensure appropriate control over the development.

9.3 Paragraph 54 of the NPPF states that *'planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.'* Planning conditions should therefore be used wherever possible where control over the construction and operation of a given development is required. Paragraph 55 of the NPPF then notes panning conditions should be kept to a minimum and only imposed where six tests are met, relating to being necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. The same principles are considered appropriate in considering the use of requirements within a DCO under the 2008 Act.

Figure 9-1: Key planning policy relating to requirements

National Planning Policy Framework (February 2019)
- Chapter 4 – Decision-making

Discharging and Enforcing Authority

9.4 One of the key tasks a local authority will need to undertake should the SoS decide to make an Order to grant development consent, will be to discharge those requirements for which it has been identified as the discharging authority. Agreeing details of the requirements is typically deferred to the relevant LPA for development management matters. Clearly, in the case of the Project Site, as explained in previous chapters of this

Statement, the administrative arrangements for development management are divided across a number of local authorities. At present, EDC holds the development management functions for the majority of the Project Site, but not exclusively so. Areas of the Order Limits fall outside of the EDC's boundary and include areas exclusively in the administrative development management areas of DBC, GBC and TC.

9.5 There is on-going dialogue with the various authorities regarding the appropriate mechanism for discharging requirements, which may lead to amendments to the *draft DCO* (document reference 3.1) in due course, bearing in mind the EDC's current responsibilities and the long-term roles of DBC and GBC. The requirements for the Essex Project Site will be dealt with by TC.

Requirements

9.6 Detailed wording of the requirements can be clarified at the examination stage, however the Applicant considers the requirements presented in the *draft DCO* (document reference 3.1) to be sufficient to allow the project to be constructed and operated with appropriate controls.

9.7 Schedule 2, Part 1 of the *draft DCO* (document reference 3.1) identifies the list of proposed requirements to the DCO. These relate to comprehensive matters including detailed design approval, phases of development, construction and environmental management (including measures to control site waste, noise and vibration, construction traffic, air quality, ecology, contaminated land and pollution prevention), landscaping, fencing and other means of enclosures, lighting details, flood risk and surface water discharge, contaminated land and groundwater, waste, protected species, ecological mitigation and management, biosecurity, historic environment, traffic management plan, employment and skills, energy and navigational risk.

9.8 The DCO requirements also provide that LRCH would comply with a number of control documents in carrying out the London Resort. The various control documents establish the framework for the construction, operation and maintenance of the London Resort and would be intrinsically linked with the DCO.

9.9 The requirements are subject to on-going discussion with the local authorities and other stakeholders as the *draft DCO* (document reference 3.1) continues to evolve and will be discussed at length throughout the Examination.

PLANNING OBLIGATIONS

Overview

9.10 A number of mitigation measures require a contribution through a planning obligation under section 106 of the Town and Country Planning Act 1990 – in order to make the development acceptable in planning terms. A planning obligation is a legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. Paragraph 54 of the NPPF identifies that planning

obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. In the case of a DCO, this can be extended to relate to requirements. Paragraph 56 of the NPPF continues that planning obligations must only be sought where they meet three tests in that they are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

9.11 These reflect the statutory tests for planning obligations set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (the 2010 Regulations).

9.12 At a local level, development plan policies seek to ensure appropriate contributions are made to provide for infrastructure and services required to support development.

Figure 9-2: Key planning policy relating to planning obligations

National Planning Policy Framework (February 2019)
- Chapter 4 – Decision-making

Dartford Core Strategy (September 2011)
- Policy CS 26: Delivery and Implementation

Gravesham Local Plan Core Strategy (September 2014)
- Policy CS10: Physical and Social Infrastructure

Core Strategy and Policies for Management of Development (January 2015)
- Policy PMD16: Developer Contributions

Commentary

9.13 Discussions are on-going with the local authorities as the effects of the development and the potential mitigation becomes clearer. Whilst some local authorities have identified potential matters for inclusion within a Section 106 Agreement these need to be considered against the relevant tests and the various benefits and mitigation. The aim is for draft Heads of Terms to be agreed during Q1 2021.

CONCLUSION

9.14 At a national level, the NPPF makes clear expectations regarding the use and application of planning conditions (requirements) and planning obligations. Planning conditions should be used wherever possible before considering planning obligations. Planning conditions must meet six tests (necessary, relevant to planning and to the development

to be permitted, enforceable, precise and reasonable in all other respects) while planning obligations must only be sought where they meet three tests (necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development).

9.15 There is on-going dialogue between LRCH and the local authorities regarding the *draft DCO* requirements and the emerging topics for inclusion in a Section 106 Agreement.

Chapter 10 ◆ Land acquisition

OVERVIEW

10.1 As part of the DCO application, LRCH, as the Applicant, is required to explain why the powers of compulsory acquisition sought in the *draft DCO* (document reference 3.1) are necessary to implement the Proposed Development. As such, a *Statement of Reasons* (document reference 4.1) accompanies this application which demonstrates that there is a compelling case in the public interest to grant the compulsory acquisition powers within the DCO. This builds upon the case developed within this Statement, the Planning Statement.

10.2 This chapter therefore seeks to provide a high level summary of matters surrounding the land acquisition strategy deployed by LRCH and the proposed use of compulsory acquisition powers, should they be necessary to fulfil the delivery of the Proposed Development and positions on voluntary acquisition not be reached.

BACKGROUND

Order Limits

10.3 As is required and appropriate for any NSIP of this nature and scale, the Order Limits have been set to allow sufficient flexibility to enable the final detailed design of the London Resort Project to be optimal, and the parameters of the Environmental Impact Assessment have been set accordingly. However, the Applicant has included no more land within the Order Limits than is required for the construction, operation and maintenance of the London Resort and it is satisfied that the Proposed Development can be so developed within the Order Limits.

Existing ownership

10.4 Given LRCH's longstanding interests in much of the Project Site and its commitment to deliver the London Resort, it has adopted a land acquisition strategy that has already seen it acquire freehold ownership of land within the Order Limits. This relate to two parcels of land, one to the north of the railway line and south of London Road (A226) known as the Sports Ground Pit and one to the south of the railway line known as Bamber Pit. These total an area of 7.5 hectares.

Existing Option Agreements

10.5 Significantly, LRCH has Option Agreements with a number of other parties on substantial landholdings across the Kent Project Site. Of greatest note is Option Agreements with Swanscombe Developments LLP across much of the Swanscombe Peninsula (157 hectares) and with EDC regarding land at Ebbsfleet Central to accommodate the London Resort

Access Road (approximately 35 hectares). Therefore approximately 50% of the land within the Order Limits has been secured.

10.6 LRCH does not currently have any ownership of the Essex Project Site, however has an agreement in principle in place with the Port of Tilbury (London) Limited and is in the process of agreeing commercial arrangements.

Land acquisition requirements

10.7 Approximately 214 hectares of the Project Site require land acquisition which is not already in LRCH's ownership or the subject of Option Agreements or commercial agreements. Of this approximately 60 hectares of permanent land acquisition is required to form the core of the Kent Project Site to the north of the North Kent Railway lining including the industrial and commercial areas surrounding Manor Way, London Road and Galley Hill Road. The *Economic and Regeneration Statement* (document reference 7.5) provides further details on the nature of this land, the existing businesses and employment generated by these businesses that would be displaced by the Proposed Development.

10.8 A summary of the land position is therefore provided at Table 10-1.

Table 10-1: Land position summary

	Kent Project Site	Essex Project Site	Project Site
LRCH is Owner	7.50 ha	-	7.50 ha
LRCH has Option Agreement	192.00 ha	-	192.00 ha
Land requiring acquisition (either by agreement or by compulsory acquisition)	188.03 ha	25.54 ha	213.57 ha
Total	387.53 ha	25.54 ha	413.07 ha

LAND REFERENCING

Overview

10.9 As detailed within the *Statement of Reasons* (document reference 4.1), an extensive exercise of land referencing has taken place, comprising both non-contact and contact referencing, thereby deploying various sources to ensure the appropriate and accurate gathering of information.

Non-contact referencing

10.10 Non-contact referencing principally took place using of Land Registry data. The Statement of Reasons identifies that updates were requested from Land Registry, ensuring updates

were received ahead of key milestones and this ensured that any changes that occurred prior to Section 42 consultation, and again before the submission of the *Book of Reference* (document reference 4.3), were captured, with follow up undertaken where new interests were revealed.

10.11 Additional desktop activities were also undertaken to confirm, verify and further investigate interests in land, which included searches of Companies House and wider internet searches.

Contact referencing

10.12 As noted within the *Statement of Reasons* (document reference 4.1), consultation with landowners and occupiers has been ongoing throughout the emergence of the London Resort since 2015. This has helped LRCH develop a firm understanding and identification of parties that have the potential to be affected.

10.13 Formal land referencing questionnaires were issued to all identified potentially affected parties to confirm and fully understand their interests in land as they became known to LRCH's land referencing team. Letters were also sent to potential statutory utilities/ undertakers in Summer 2020 that were believed to possibly hold an interest in the area to determine their interests

10.14 The *Statement of Reasons* (document reference 4.1) notes that in the case of unregistered land, where information could not be obtained from HM Land Registry and other referencing processes, site notices were affixed on or adjacent to the land inviting persons with an interest in this land to come forward.

10.15 Despite these efforts and all diligent inquiries, there remain plots identified in the *Book of Reference* (document reference 4.3) where the land referencing exercises undertaken have not been able to identify ownership.

LAND ACQUISITION BY AGREEMENT

10.16 The *Statement of Reasons* (document reference 4.1) identifies the engagement undertaken with affected parties. The document details the provisions of offering an enhanced level of compensation by LRCH to acquire land by agreement without the requirement for compulsory acquisition powers. In all cases, it is LRCH's preference to agree land acquisition by agreement rather than requiring to enact compulsory acquisition powers.

10.17 The *Statement of Reasons* (document reference 4.1) also identifies the use of Option Agreements by agreement with landowners. This is important because, as it is LRCH's intention to agree terms with landowners a long time before the grant of powers of compulsory acquisition, Option Agreements will commit LRCH to the figures agreed but leaves the claimant able to withdraw and submit a claim in the conventional way where they consider that during the period of time between agreeing the figures that

circumstances have changed to the point that they would be better served under compulsory acquisition.

10.18 For several years, LRCH has sought, and will continue to seek, to negotiate acquisition of interests where possible by voluntary agreement.

COMPULSORY ACQUISITION

10.19 As noted above, LRCH has sought, and will continue to seek, to negotiate acquisition of interests wherever possible by voluntary agreement in the first instance. However, it is also necessary for it to seek appropriate powers to ensure that the Proposed Development can be brought forward in a reasonable and commercial timeframe or where landowners are not prepared to enter into voluntary agreements.

10.20 LRCH is satisfied that the conditions as set out in section 122 of the Planning 2008 are met and that the tests in the Compulsory Acquisition Guidance are satisfied in that all of the land subject to compulsory acquisition and temporary possession powers is necessary to construct, operate, maintain and mitigate the London Resort. LRCH is firmly of the view that the extent of the land sought is reasonable and proportionate to its proposals to deliver the London Resort.

10.21 The required land take is demonstrated through the careful refinement of the masterplanning exercise over the course of many years which reflects the operation requirements but also respects the site constraints, including ground conditions, ecology, flood risk and other matters.

FUNDING

10.22 The *Statement of Reasons* (document reference 4.1), in collaboration with the *Funding Statement* (document reference 4.2) also identify that those affected by the exercise of compulsory acquisition or temporary use powers will be entitled to compensation and LRCH has the funding resources to provide such compensation.

10.23 In short, LRCH has the ability to procure the financial resources necessary to fund the construction, operation and maintenance of the Proposed Development and the provisions contained within the *draft DCO* (document reference 3.1) sufficient to meet the capital expenditure for:

- The cost of acquiring the land identified within the DCO; and
- The cost of compensation otherwise payable in accordance with the DCO.

10.24 As a result, the SoS can be assured that sufficient funding for payment of compensation will be available to the Applicant if compulsory acquisition powers are provided in the DCO.

PUBLIC INTEREST AND HUMAN RIGHTS

Public Interest

10.25 There is a compelling case in the public interest to include the compulsory acquisition powers sought by LRCH within the DCO. As parts of this Statement and separately the *Economic and Regeneration Statement* (document reference 7.5) and *Statement of Reasons* (document reference 4.1) have demonstrated, there are substantial benefits to be realised through the delivery of the London Resort. These include, but are not limited to the economic, environmental and social themes of sustainable development, such as:

- Regeneration of a key long-term development site, identified within development plan documents and forming part of the Thames Estuary Growth area, including dealing with complicated ground conditions;
- Development of a scheme of National Significance, representing a global scale entertainment resort, representing the first such facility in the UK;
- Strengthen Britain's overall attractiveness as a tourism destination among those who have not yet visited Britain, encourage overseas visitors to spend longer in the UK and encourage prior visitors to return, all of which will create further economic benefits;
- The delivery of over 23,300 gross job years (equivalent to approximately 2,320 Full Time Equivalent (FTE)) during construction and 17,310 workers (11,215 FTEs) during operation at maturity in 2038. The London Resort will become one of the largest single site employers in the UK;
- A major development that creates a substantial number of construction and operational jobs is expected to be a substantial benefit to the local communities. Moreover, the construction and operation of the London Resort is expected to generate significant opportunities for local people to gain employment, upskill, and further their professional development;
- Substantial economic benefits at a local, regional and national level, with a Gross Value Added of £520m at maturity in 2038;
- It is estimated that the London Resort is expected to result in additional tax revenues of between £150m and £200m each year by 2038;
- Ecological enhancements across Swanscombe Peninsula and beyond with an overall Biodiversity Net Gain (BNG) via the creation of an off-site biodiversity offsetting scheme involving the creation of new wetland habitat, including floodplain grazing marsh, ditches, reed beds, and delivery on-site of a suite of habitat creation and enhancement measures to create/maintain a mosaic of habitats as currently present on site, along with their long term management and maintenance;

- A large proportion of the Swanscombe Peninsula landscape will remain undeveloped or subject to enhancement, providing considerable biodiversity, landscape and access improvements;

- Delivery of a high quality landscape setting, responding to not only the constraints but also identifying opportunities for betterment across accessibility and public facilities to and around the Swanscombe Peninsula;

- Management of contaminated land and delivery of a suitable, safe land use from which to maximise the benefits of an otherwise heavily contaminated site; and

- The London Resort Academy which will be capable of providing on-going training to allow employees to progress their skills, experience and expertise.

10.26 In the absence of compulsory acquisition powers, LRCH considers that it would not be possible to proceed and deliver the London Resort, therefore the substantial public benefits would not be realised.

Human Rights

10.27 As detailed in section 9 of the *Statement of Reasons* (document reference 4.1), LRCH is satisfied that, although Convention rights are likely to be engaged, the Proposed Development will not conflict with Convention rights and will be proportionate in that there is a compelling case in the public interest for the Proposed Development which outweighs the impact on individual rights. In this context, it is relevant that those affected will be entitled to compensation.

10.28 First, LRCH considers that there would be very significant public benefit arising from the grant of the DCO. That benefit can only be realised if the DCO includes the grant of powers of compulsory acquisition and temporary use. As demonstrated earlier in this Planning Statement, the need for the Proposed Development has been identified and is considered to be of national significance given the Direction by the SoS.

10.29 The *Statement of Reasons* (document reference 4.1) and *Consultation Report* (document reference 5.1) detail how third parties have been able to make representations during the preparation of the application during the numerous statutory and non-statutory consultation exercises since 2014, most recently between July and September 2020. The *Consultation Report* (document reference 5.1) also provides details of how regard has been given to all consultation responses.

10.30 For these reasons, LRCH considers that the inclusion of powers of compulsory acquisition would not breach the Convention rights of those whose are affected and that it would be appropriate and proportionate to make the DCO, including the grant of powers of compulsory acquisition.

CONCLUSION

10.31 This chapter has provided an overview of the land acquisition matters affecting the London Resort. LRCH, as the Applicant, already has interest in approximately 199.5 hectares of the Project Site by way of Option Agreements with existing landowners or freehold ownership. A further 213.57 hectares remain to be acquired by agreement or through compulsory acquisition.

10.32 LRCH has, and will continue to seek, to negotiate acquisition of interests wherever possible by voluntary agreement in the first instance. However, it is also necessary for it to seek appropriate compulsory acquisition powers to ensure that the Proposed Development can be delivered.

10.33 The Applicant submits that the inclusion of powers of compulsory acquisition in the DCO for the purposes of the Proposed Development meets the conditions of Section 122 of the 2008 Act as well as the considerations in the relevant Guidance.

10.34 The acquisition of land and rights (including restrictive covenants) and the temporary use of land, together with the overriding of interests, rights and restrictive covenants and the suspension or extinguishment of private rights is no more than is reasonably required to facilitate or is incidental to the Proposed Development. Furthermore, the land identified to be subject to compulsory acquisition is no more than is reasonably necessary for that purpose and is proportionate, as is shown in the *draft DCO* (document reference 3.1), the *Works Plans* (document reference 2.5) and other information principally set out within the *Statement of Reasons* (document reference 4.1).

10.35 The need for the Proposed Development, suitability of the Order limits, the benefits that the Proposed Development would create demonstrate that there is a compelling case in the public interest for the land to be acquired compulsorily. The Applicant considers that the very substantial public benefits that would arise from the proposed compulsory acquisition of the interests within the Order Land would clearly outweigh the private loss that would be suffered by those whose land is to be acquired.

Chapter 11 ◆ Summary and conclusions

OVERVIEW

11.1 This chapter of the document seeks to draw together the findings and conclusions of previous chapters of this Statement. In doing so, it seeks to provide and overall assessment of planning balance for the Proposed Development.

SUMMARY OF BENEFITS AND EFFECTS

11.2 The Project Site covers a significant area of land across a number of local authority areas, both north and south of the River Thames. With particular reference to the Kent Project Site, the area is largely previously developed land which suffers from some considerable ground contamination issues which has hampered its delivery as a key long-term regeneration site for a number of years. The London Resort offers a considerable opportunity to transform and unlock the economic, social and environmental opportunities the Project Site has to offer, delivering sustainable development that will have benefits for decades to come.

11.3 The nature of the Proposed Development is that it is unique, seeking to deliver the UK's first global entertainment resort that will attract both domestic and international visitors. The London Resort represents a unique opportunity for the UK to develop a global scale entertainment resort that is absent from the UK's tourism offer. There is only one similar facility in Europe, based near Paris, and given London's status as a world leading tourist destination (for international and domestic visitors) and the fantastic transport connections available between London and the Project Site then the potential benefits for north Kent, and south Essex and very substantial indeed.

11.4 The Proposed Development will result in significant built form, developed and refined over a complex masterplanning exercise which has emerged over the course of many years, with each iteration being carefully critiqued to ensure its appropriateness in terms of its operational capabilities and offering to visitors, but also its context, respecting the existing constraints and land uses. The *Illustrative Masterplan* (document reference 2.21) demonstrates how the Swanscombe Peninsula could be transformed by the carrying out of the Proposed Development.

11.5 Given the nature of the Proposed Development, there are significant benefits to be derived from the scheme. There are also effects which have been identified and require mitigation to arrive at an acceptable form of development. The following sections seek to capture the key benefits and effects of the Proposed Development allowing an overall planning balance to be reached.

Benefits

11.6 The principal, but not exhaustive, benefits of the Proposed Development have been identified as:

- Significant capital investment – the London Resort requires significant capital investment in excess of £2bn to ensure its delivery. This investment will demonstrate significant private sector confidence in the Proposed Development, location and local community;

- Local, regional and national economic benefits – the London Resort will realise very substantial economic benefits at micro-economic and macro-economic scales, including supply chain opportunities and substantial increases in GVA and tax revenues;

- Regeneration of previously developed (brownfield) land – the London Resort will facilitate the regeneration of a Project Site of over 413 hectares, including large areas of previously developed land, helping drive the delivery of the Ebbsfleet Garden City vision and bringing forward of a strategic site which has long been identified for growth in development plan documents;

- Ebbsfleet community – the London Resort will act as a catalyst to fulfilling the delivery of Ebbsfleet as a community, helping it achieve its vision of becoming a desirable place to live and work, thereby reducing out-commuting;

- Ebbsfleet Garden City – the London Resort will transform the profile of the Garden City by providing a global platform and recognition of this area. This will significantly increase interest in the area, and will be very important to the success of the Ebbsfleet Central new developmet near Ebbsfleet international Station as a result of the millions of annual visitors;

- Careers – the construction and operation of the London Resort is expected to generate significant opportunities for people to gain employment, upskill, and further their professional development. The jobs will vary in terms of the industry sector, the level of skills and experience required, the number of hours required and seasonality;

- Substantial employment opportunities – the London Resort will offer significant employment opportunities, initially during the construction phase but importantly during the operational phase, with no decommission date. At maturity in 2038, the London Resort is estimated to provide employment for an estimated 17,310 workers (11,215 FTEs), becoming one of the largest single site employers in the UK;

- Ecology – the London Resort will carefully implement its ecological mitigation and management plans to sensitively build out the Proposed Development while minimising impacts on local habitats and wildlife found on the Swanscombe Peninsula, and delivering a Biodiversity Net Gain;

- Transport infrastructure – the London Resort will deliver a new ferry terminal at Swanscombe. This will be a popular route for visitors from central London or the "Park & Glide" at Tilbury. Importantly, the ferry terminal will be available for public use and thus is a major transport enhamnecment for the Garden City.

- Public access and accessibility – the London Resort will deliver significant improvements to accessibility across the Swanscombe Peninsula, including walking and cycling, representing a benefit for the local community and visitors alike to benefit from and link in with the natural environment;

- Management of contaminated land – the London Resort will provide a suitable end land use from which to maximise the benefits of an otherwise heavily contaminated site; and

- Delivery of a unique attraction – the London Resort will represent a unique global entertainment resort not seen anywhere else in the UK and with only limited comparables within Europe. The London Resort will provide a collection of entertainment facilities and attractions, with two Gates behind the 'payline' offering the latest exciting rides and experiences and additional attractions (including Conferention centre, Coliseum and Water Park) outside the payline.

Effects

11.7 The principal effects of the Proposed Development have been identified as:

- Displacement and land acquisition – the London Resort will require the displacement of existing businesses (and thereby some existing employment opportunities) and a single residential building containing three dwellings from within the Kent Project Site. The Applicant is seeking powers in the DCO to enable it to permanently acquire land and rights over, in and under the Order Land necessary for the construction, operation and maintenance of the London Resort, as well as rights to temporarily possess and use specific parts of the Order Land to facilitate the construction, operation and maintenance of London Resort;

- Public Rights of Way – the London Resort will affect existing PRoWs within the Kent Project Site, requiring alterations, diversions and improvements, which can be judged against the proposed provision;

- Ecology – the London Resort will be located adjacent to areas identified as having ecological value across the Swanscombe Peninsula, requiring careful mitigation and ongoing management; and

- Transport – the London Resort benefits from excellent public transport options with international and local rail stations nearby, new ferry facility at Swanscombe and enhanced facility at Tilbury to provide river access, expansion of Fastrack and other bus services and excellent cycling and walking connections to existing and emerging

communities. There will be an important element of access by car which will have effects which can be largely mitigated.

OVERALL PLANNING BALANCE

11.8 The London Resort will deliver very significant economic, social and environmental benefits to the local, regional and national levels. This includes both direct and indirect benefits attributed to temporary construction employment, operational employment and supply chain.

11.9 Whilst potential adverse effects arise from the London Resort, subject to appropriate mitigation as identified, these would not result in significantly adverse impacts on the local, regional or national context sufficient to override the overall presumption in favour of granting the DCO.

11.10 The London Resort would deliver a major global entertainment resort, addressing significant shortfall in the existing provision nationally, appealing to a domestic and international tourist markets.

11.11 Substantial benefits arising in terms of job creation, upskilling the local workforce and to the local economy, that weigh significantly in its favour. It is considered that the significant benefits delivered by the London Resort would outweigh the residual adverse impacts identified following mitigation.

11.12 While there are no NPS for business and commercial developments, the underlying planning policy context at a national, regional and local level identify a policy presumption in favour of granting consent.

11.13 In this regard, Section 105 of the Planning Act 2008 sets out issues that the SoS must have regard to in making his decision where a relevant NPS is not designated. This includes any matter that 'the Secretary of State thinks is important and relevant to the Secretary of State's decision.'

11.14 As has been demonstrated throughout this Statement, the underlying planning policy context at a national, regional and local level identify a policy presumption in favour of granting consent. There are considered to be clear and compelling reasons why, even in the absence of a topic specific NPS, the SoS can conclude the London Resort will generate significant benefits of national significance, and thus demonstrating a clear and compelling case in favour of the DCO being made.

Appendices

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Appendix 1.0 – Explanatory Memorandum to the Infrastructure Planning (Business or Commercial Projects) Regulations 2013

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EXPLANATORY MEMORANDUM TO

THE INFRASTRUCTURE PLANNING (BUSINESS OR COMMERCIAL PROJECTS) REGULATIONS 2013

2013 No. [XXXX]

1. This explanatory memorandum has been prepared by the Department for Communities and Local Government and is laid before Parliament by Command of Her Majesty.

This memorandum contains information for the Joint Committee on Statutory Instruments.

2. Purpose of the instrument

2.1 The purpose of this instrument is to set out the types of business or commercial projects that can potentially be authorised using the existing authorisation process for nationally significant infrastructure projects under the Planning Act 2008. This new category of projects was added through the Growth and Infrastructure Act 2013.

3. Matters of special interest to the Joint Committee on Statutory Instruments

3.1 None

4. Legislative Context

4.1 Section 26 of the Growth and Infrastructure Act 2013 amended Part 5 of the Planning Act 2008 to enable certain types of business or commercial projects falling within a prescribed description to be authorised under the planning regime that applies to nationally significant infrastructure projects. These Regulations contain that prescribed description. Development that is or forms part of a project falling with the prescribed description can be authorised under that planning regime if that project meets the other requirements in section 35 of the Act and the Secretary of State gives a direction under that section. Before making a direction, the Secretary of State must think that the particular project is of national significance.

5. Territorial Extent and Application

5.1 This instrument applies to England.

6. European Convention on Human Rights

6.1 The Parliamentary Under Secretary of State, Nick Boles, has made the following statement regarding Human Rights:

In my view the provisions of The Infrastructure Planning (Business or Commercial Projects) (England) Regulations 2013 are compatible with the Convention rights.

7. Policy background

7.1 The Government, through the Growth and Infrastructure Act 2013, has expanded the nationally significant infrastructure planning regime to include certain business and commercial projects. Developers of certain projects will be able to 'opt-in' to the nationally significant infrastructure regime, where the projects are of national significance. Following an application from the developer to use this route, the Secretary of State will decide whether to issue a direction. The Secretary of State may give a direction if the Secretary of State thinks that t a project is 'nationally significant' and it meets the other requirements in section 35 of the Planning Act 2008. The effect of a direction is that the development that is subject to the direction must obtain consent through the nationally significant infrastructure planning regime under the Planning Act 2008.

7.2 The Government has expanded the scope of the nationally significant infrastructure planning regime to include certain business and commercial projects due to concerns over the speed with which these applications are being handled by local planning authorities. In recent years, there has been a decline in the speed with which local planning authorities have been determining large-scale major planning applications, despite a reduction in the number of cases that authorities have to process. Over the four years 2008/09 to 2011/12, the proportion of large-scale major applications that were determined within 13 weeks fell from 68% to 47%[1], at the same time as a corresponding fall from 481 large-scale major commercial and industrial decisions to just 320 decisions. At the same time, the number of cases in this category taking over 52 weeks to decide increased from 8% to 13%.

7.3 The Government recognises that the most significant business and commercial schemes can raise complex and controversial issues and may require a number of different associated consents. They may also be the subject of a call-in request or appeal, which can add to the time taken to determine the scheme, resulting in additional costs and uncertainty for the applicant as well as the local planning authority and other parties. These features potentially delay much needed investment in projects which could be beneficial for growth and the wider economy.

7.4 To help address these concerns, the extension of the regime to business and commercial projects will enable developers of certain projects to 'opt-in' to the nationally significant infrastructure planning regime, where projects are of national significance. The benefits of the nationally significant infrastructure regime includes statutory timetabling which requires a decision

[1] Large-scale major commercial development is defined here as including office/research and development/light industry; general industry, storage and warehousing with a floor area greater than 10,000 m² 2011/12 https://www.gov.uk/government/organisations/department-for-communities-and-local-government/series/planning-applications-statistics

to be made within 12 months from the start of the examination, and the 'one stop shop' approach to development consent – a Development Consent Order automatically remove the need to obtain several consents that would otherwise be required and may remove the need for other consents on a case by case basis.

7.5 These regulations prescribe the types of projects which can be authorised as a business or commercial project under the nationally significant infrastructure planning regime. Developers will need to seek a direction from the Secretary of State that a project is nationally significant. The Government has published in a Written Ministerial Statement the factors that the Secretary of State will need to take into account when considering whether a project was nationally significant.

8. Consultation outcome

8.1 The Government consulted on proposals for extending the nationally significant infrastructure planning regime to business and commercial developments in November 2012 for a period of 6 weeks and published its response in June 2013. The consultation sought views on the following questions:

1. A proposed list of development types;

2. Whether thresholds should apply, and, if so, whether those in the consultation document were appropriate;

3. Our assessment of the factors that the Secretary of State would need to take into account when considering whether a project was nationally significant;

4. Whether retail projects should not be a prescribed business or commercial project;

5. Whether a National Policy Statement (or Statements) should be prepared for the new business and commercial category; and,

6. Whether there were any other comments on the proposals.

8.2 One hundred and two responses were received, including from a range of developers, local authorities, environmental organisations and members of the public.

8.3 In response to the consultation, the Government concluded that developers of nationally significant projects falling within the following broad descriptions of development should generally be able to use the nationally significant infrastructure planning regime:

o Offices and research and development

- o Manufacturing and processing
- o Warehousing, storage and distribution
- o Conference and exhibition centres
- o Leisure, tourism and sports and recreation
- o Aggregate and industrial minerals

8.4 The Government also decided in response to the views expressed through the consultation that proposals involving the extraction of coal, oil and gas or peat will not be included in the new business and commercial category. This position will be kept under review. In addition, the Government decided not to set statutory thresholds through the accompanying secondary legislation but intends to publish a policy document setting out the factors that the Secretary of State will take into account including indicative thresholds.

8.5 The proposal not to include retail as a prescribed form of development in the accompanying regulations was widely welcomed by respondents to the consultation and the Government plans to maintain that position. The Government also continues to consider that the case for a National Policy Statement, or Statements, for business and commercial projects is not strong. The Government will keep this position under review.

9. Guidance

9.1 The Government has set out in a Written Ministerial Statement the factors that the Secretary of State will consider when determining whether a project is of national significance.

9.2 A range of guidance is available for developers using the nationally significant infrastructure regime, including on Pre-application Consultation; Examination; Fees; Compulsory Acquisition; Forms; and Associated Development. The Planning Inspectorate also publishes a range of advice notes on the day to day operation of the regime.

10. Impact

10.1 These Regulations prescribe the types of business or commercial projects that can potentially be authorised via the nationally significant infrastructure planning regime. The Government's overarching aim has been to provide an additional option for authorising for large-scale proposals of national significance.

10.2 Developers of major schemes will be able to decide on a case by case basis whether they would prefer to use the nationally significant infrastructure planning regime and will only do so where there is a net benefit to their business. The responsibility for the vast majority of commercial and business planning applications will remain with local planning authorities. An impact assessment for these proposals was prepared as part of the Growth and Infrastructure Act 2013.

10.3 Local people and other parties affected by a proposed development will have an opportunity to be heard through the nationally significant infrastructure planning regime's procedures for pre-application consultation, representations and examination. The infrastructure planning regime seeks to use a more inquisitorial mode of examination and not an adversarial one which many people can find difficult to engage with and can deter people from giving evidence at hearings. Planning Inspectors will also seek to use the written representations mode of examination where possible but parties can request the right to be heard at a hearing.

10.4 A full impact assessment was prepared for these proposals as part of the Growth and Infrastructure Act an Impact Assessment and as such, a further Impact Assessment has not been prepared for this instrument. The Growth and Infrastructure Act Impact Assessment is available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/39364/121219_Growth_and_Infrastructure_Impact_Assessment.pdf

11. Regulating small business

11.1 The regulations apply to business and commercial projects that would be considered of national significance and as such, are unlikely to apply to small businesses. The vast majority of such projects would involve to multi-million pound capital costs and as such, we take the view that a small business is very unlikely to submit an application for a development which is likely to be considered of national significance.

12. Monitoring & review

12.1 The Department for Communities and Local Government will keep the major infrastructure regime under the Planning Act under review, including how it applies to business and commercial projects.

13. Contact

13.1 Sue Lovelock at the Department for Communities and Local Government. Tel: 0303 4443759 or email: Susan.Lovelock@communities.gsi.gov.uk can answer any queries regarding the instrument.

Appendix 2.0 – Secretary of State's Direction

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Department for Communities and Local Government

Mr Christopher Potts
Director
Savills
33 Margaret Street
London
W1G 0JD

e-mail

Please ask for: Ray Colbourne
Tel: 0303 44 8075
Email:

Your ref:

Our ref: NPCU/RARE/T2215/73637

Date: 9 May 2014

Dear Mr Potts

DIRECTION BY THE SECRETARY OF STATE UNDER SECTION 35(1) OF THE PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (BUSINESS OR COMMERCIAL PROJECTS) REGULATIONS 2013 RELATING TO WORLD CLASS RESORT AND LEISURE ENTERTAINMENT DISTRICT KNOWN AS "LONDON PARAMOUNT", SWANSCOMBE PENINSULA AND LAND TO THE SOUTH TOWARDS EBBSFLEET STATION, KENT

I refer to your letters dated 25 March 2014 and 11 April 2014 relating to the above legislative provisions requesting the Secretary of State to give a Direction allowing the London Resort Company Holdings (LRCH) project known as "London Paramount" at Swanscombe Peninsula and land to the south towards Ebbsfleet Station, Kent, to be treated as development of national significance for which development consent is required under section 35 of the Planning Act 2008.

This Secretary of State notes that this proposal is mainly for the construction of buildings and facilities for tourism and leisure uses, that it does not include the construction of any dwellings nor does it include the winning and working of peat, coal, oil or gas. The Secretary of State is therefore satisfied that this proposal falls within a business or commercial project of a prescribed description for the purposes of section 35(2)(a)(ii) of the Planning Act 2008 and Regulation 2 of The Infrastructure Planning (Business or Commercial Projects) Regulations 2013.

The Secretary of State has assessed the request against the criteria in the relevant policy statement and has considered all other relevant matters and thinks that the project is nationally significant. Hence, the project can be treated as development for which development consent is required under the Planning Act 2008.

The Secretary of State considers that the proposal would be likely to have significant economic impact, be important in driving growth in the economy, and that it would have an impact on an area wider than a single local authority area. The Secretary of State also considers that the substantial physical size of the proposal is relevant to his decision that this project is of national significance.

The Secretary of State also thinks that this would be a project that would benefit from the 'single authorisation' process offered by the Planning Act 2008 regime.

This Direction is given without prejudice to the Secretary of State's consideration of any application for an order granting development consent relating to the proposal.

I am sending a copy of this Direction letter to the Planning Inspectorate and Dartford and Gravesham Councils.

Signed by

Ranuka Jagpal
Head of the National Planning Casework Unit
Authorised to sign on behalf of the Secretary of State

Appendix 3.0 – National Planning Policy Framework summary

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NATIONAL PLANNING POLICY FRAMEWORK (FEBRUARY 2019)

Table A3-1: Summary of National Planning Policy Framework (February 2019)

Chapter	Summary
Chapter 1: Introduction Paragraphs 1-6	This chapter notes that the NPPF sets out the Government's planning policies for England and how these should be applied. However, paragraph 5 notes *'The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.'* Paragraph 6 notes *'Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.'*
Chapter 2: Achieving sustainable development Paragraphs 7-14	This chapter identifies the purpose of the planning system is to contribute to the achievement of sustainable development, recognised as the ability to meet the needs of the present without compromising the ability of future generations to meet their own needs. The NPPF identifies that achieving sustainable development relies on three overarching objectives – economic, social and environmental. Paragraph 10 of the NPPF notes that at the heart of the document is the *'presumption in favour of sustainable development.'* Paragraph 11 elaborates that, for decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay, or, where there are no relevant development plan policies (or they are out-of-date), granting permission unless there is a clear reason for refusing the development based on the policies within the NPPF or the adverse impacts would *'significantly and demonstrably'* outweigh the benefits when assessed against the policies of the NPPF, when taken as a whole.
Chapter 3: Plan-making	This chapter encourages a genuinely plan-led system through the encouragement of up-to-date plans which contain a positive vision for the

Paragraphs 15-37	future of their areas, addressing the economic, social and environmental needs and priorities. The chapter continues in identifying a plan-making framework. Paragraph 34 identifies that development plans should set out the contributions expected from development but that such policies should not undermine the deliverability of the plan.
Chapter 4: Decision-making Paragraphs 38-58	Paragraph 38 identifies that *'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should… work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'* The chapter continues in identifying that early engagement, through pre-application engagement and front-loading, can help improve the efficiency and effectiveness of the planning system. The chapter continues to provide an overview on best practice when determining planning applications, the use of local controls available to LPAs (for example, Local Development Orders) and the use of planning conditions and obligations. Paragraph 54 identifies that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. In the case of a DCO, this can be extended to relate to requirements. Paragraph 56 continues that planning obligations must only be sought where they meet three tests in that they are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
Chapter 5: Delivering a sufficient supply of homes Paragraphs 59-79	This chapter identifies the pressing need for land for housing to ensure the adequate supply of land for housing. Paragraph 59 notes *'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed…'* The chapter notes that local housing need assessment should be undertaken to ensure adequate provision is made. Paragraph 73 notes:

	'Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.' The chapter also recognises issues such as affordable housing provisions across small and large sites.
Chapter 6: Building a strong, competitive economy Paragraphs 80-84	This chapter relates to economic development. Paragraph 80 notes that: *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'* Paragraph 82 indicates that planning policies and decisions should recognise and address the specific locational requirements of different sectors.
Chapter 7: Ensuring the vitality of town centres Paragraphs 85-90	This chapter seeks to ensure planning policies and decisions support the role town centres play in the context of local communities through taking a positive approach to their growth, management and adaption. For out of centre proposals, preference is given to sites which are well connected and accessible to the town centre. The NPPF also makes provision for retail and leisure development outside of town centres, and which are not in accordance with an up-to-date development plan, by requiring an impact assessment if the development is over a locally set threshold (or 2,500 m^2 of gross floorspace if a locally set threshold has not been set). Paragraph 89 sets out what the impact assessment should assess, including the impact of the proposal on: *'a) existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and* *b) town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).'*
Chapter 8: Promoting healthy and safe communities	This chapter identifies that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.

Paragraphs 91-101	Paragraph 92 sets out how planning policies and decisions should *'provide the social, recreational and cultural facilities and services the community needs'.* Paragraph 95 goes onto promote public safety and wider security and defence requirements through *'anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate'.* The paragraph goes on to explain this can be achieved through the layout and design of developments informed by the most up-to-date information available from the police and other agencies of this nature. The chapter continues to promote healthy and safe communities through the provision of open space and recreation which LPAs should seek to provide through robust and up-to-date assessment for their need, recognising in paragraph 96 that *'access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities'.* Paragraph 97 notes that *'Existing open space, sports and recreational buildings and land, including fields, should not be built on unless… an assessment has been undertaken showing such features are surplus to requirements, or the loss would be replaced by equivalent provision, or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use'.* The chapter continues to require planning policies and decisions to protect and enhance public rights of way and accesses through connecting existing networks, as well as setting out the provision for the designation and management of Local Green Space.
Chapter 9: Promoting sustainable transport Paragraphs 102-111	This chapter seeks to ensure transport issues are considered from the earliest stages of plan-making and in development proposals to ensure potential impacts are addressed and opportunities are identified and pursued. Paragraph 103 states:

	'Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes' The paragraph goes on to explain how such sustainable transport can reduce congestion and emissions, and improve air quality and public health. The chapters continues to set out the requirements for planning policies in terms of supporting a mix of uses across an area and within larger scale sites to minimise journeys, the alignment of strategies and investments, identify and protect sites and routes critical to realise opportunities for large scale development, provide for high quality walking and cycling networks, provide for any large scale transport facilities, and recognise the importance of general aviation airfields. The chapter also sets out the parking standards and requirements for development proposals. The chapter goes on to consider development proposals through ensuring that opportunities to promote sustainable transport modes are taken up, access is safe and suitable for all users, and that any significant impacts on the transport network are acceptably mitigated. Paragraph 109 states *'Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.* Paragraph 111 outlines that *'All developments that will generate significant amount of movement should be required to provide a travel plan, and the application should be supported by a transports statement or transport assessment so that the likely impacts of the proposal can be assessed'.*
Chapter 10: Supporting high quality communications Paragraphs 112-116	This chapter recognises that '…high quality and reliable communications infrastructure is essential for economic growth and social well-being.'
Chapter 11: Making effective use of land	This chapter sets out how planning policies and decisions should promote the effective use of land to meet the needs for homes and other uses, whilst also seeking to safeguard and improve the environment ensuring safe and healthy living conditions.

Paragraphs 117-123	The chapter details how local planning authorities should proactively bring forward land suitable for development, with a specific emphasis on previously developed or 'brownfield' land by using their full range of powers to secure better development outcomes. The chapter further states that *'planning policies and decisions need to reflect changes in the demand for land.'* Paragraph 121 states *'LPAs should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs'.* The chapter continues by setting out criteria when considering planning policies and decisions to support development that makes efficient use of land seeking to achieve appropriate densities. In terms of an existing or anticipated shortage of land for meeting identified housing needs, paragraph 123 states *'it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site'*
Chapter 12: Achieving well-designed places Paragraphs 124-132	This chapter highlights the importance of creating high quality buildings and places through good design to which paragraph 124 states *'is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.* The paragraph further states that *'being clear about design expectations ...is essential to achieving this… and so too is effective engagement between applicants, communities, LPAs and other interests throughout the process'.* Amongst other matters, paragraph 127 notes that developments should be *'visually attractive as a result of good architecture, layout and appropriate and effective landscaping'* while being *'sympathetic to local character and history, including the surrounding built environment and landscape setting…'* The chapter goes onto to set out the design expectations for proposals including tools made available to developers. It also emphasises that design quality should be considered throughout the evolution and

	assessment of individual proposals and encourages early discussion and engagement. Paragraph 131 refers to high standards of design, stating *'great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area'*
Chapter 13: Protecting Green Belt land Paragraphs 133-147	This chapter relates to the designation, review and management of Green Belt land. Paragraph 135 suggests new Green Belts should only be established in exceptional circumstances. Paragraph 136 suggests that, once established, Green Belt boundaries should only be altered during exceptional circumstances, where evidenced and justified. Paragraphs 143 to 147 relate to development management within Green Belt, noting that *'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'* Paragraph 146 notes that *'Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:* *…c) local transport infrastructure which can demonstrate a requirement for a Green Belt location…'*
Chapter 14: Meeting the challenge of climate change, flooding and coastal change Paragraphs 148-169	Paragraph 148 states *'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure'.* Paragraph 150 supports the planning of new development in ways that: *'a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*

	b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards'. The chapter further discusses how plans should help to increase the use and supply of renewable and low carbon energy and heat. Paragraph 153 sets out the expectations LPAs should have when determining applications for new development: *'a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and* *b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption'* The chapter further provides advice to LPAs on best practice when determining planning applications with regard to flood risk from all sources and coastal change with consideration to reducing risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.
Chapter 15: Conserving and enhancing the natural environment Paragraphs 170-183	This chapter seeks to protect and enhance the natural and local environment and sets out measures to which planning policies and decisions should achieve. In terms of conserving and enhancing the natural and local environment Paragraph 172 states that *'great weight should be given to …landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty'.* The chapter continues to discuss considerations to the Heritage Coast and requires that planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. In terms of habitats and biodiversity considerations, the chapter seeks to protect and enhance such areas, including geodiversity, and sets out what plans should include and the principles to which LPAs should apply to planning applications where these aspects are a consideration. Paragraph 178 notes that *'Planning policies and decisions should ensure that:*

	a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities…' The chapter continues to consider ground conditions and pollution matters and states in Paragraph 179 that *'Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'.* In terms of ensuring new developments of acceptable in this regard, paragraph 180 states *'Planning policies and decisions should …ensure new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions, and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development'.* The chapter goes onto to discuss aspects planning policies and decisions should consider including compliance with relevant national objectives, opportunities to improve air quality and mitigation impacts, and the effective integration of new development with existing businesses and community facilities.
Chapter 16: Conserving and enhancing the historic environment Paragraphs 184-202	This chapter seeks to protect heritage assets which includes sites and buildings of local, national and international importance. The chapter places a strong emphasis on these being an irreplaceable resource and as such should be conserved in a manner appropriate to their significance. In this regard, the chapter continues to set out how LPAs should conserve these assets through a positive strategy, including control mechanisms such as designation of conservation areas. In terms of proposals affecting heritage assets, applicants are required to describe the significance of any heritage assets affected including contribution made by their setting. Proposals with a potential archaeological interest are also expected to submit an appropriate desk-based assessment and field evaluation, where necessary. LPAs are expected to identify and asses the particular significance of any heritage asset potentially affected by a proposal as part of their consideration of the impact on the heritage asset to avoid or minimise any conflict between the proposal and the assets conservation. Paragraph 192 sets out what LPAs should consider when determining applications of this nature, including the following:

	a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. The chapter continues to discuss how development proposals should consider their potential impacts on heritage assets including considerations such as substantial harm and non-designated heritage assets.
Chapter 17: Facilitating the sustainable use of minerals Paragraphs 203-211	The sufficient supply of minerals to provide infrastructure, buildings, energy and goods is considered essential and this chapter sets out how planning policies should ensure minerals are best used to secure their long-term conservation. Paragraph 205 states *'When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy'.* The chapter further sets out how minerals planning authorities should maintain supply of minerals through a steady and adequate supply.

Appendix 4.0 – Local planning policy summary

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DARTFORD BOROUGH COUNCIL

Existing local planning policy

Table A4-1: Summary of Dartford Core Strategy (September 2011)

Document	Policy/page/paragraph	Summary
Dartford Core Strategy (September 2011)	Policy CS1: Spatial Pattern of Development	This policy sets out the focus for development in three priority areas of Dartford, being: a) Dartford Town Centre & Northern Gateway; b) Ebbsfleet to Stone; and c) The Thames Waterfront. The policy also makes provision for development proposals with groups of sites.
	Policy CS2: Dartford Town Centre	This policy sets out how the Council will improve its range of attractions and environment in Dartford Town Centre through a series of criteria (a-n). Point 2 of the policy requires applications to be supported by a transport assessment accounting for proposals in the town centre as well as those in the Northern Gateway, and also requires a Travel Plan for each application including local improvements in relation to the proposed development.
	Policy CS4: Ebbsfleet to Stone Priority Area	This policy defines the Council's expectations for development proposals within the Ebbsfleet to Stone Priority Area, through collaboration to achieve the specified policy outcomes.
	Policy CS5: Ebbsfleet Valley Strategic Site	This policy defines the Council's expectations for development proposals within the Ebbsfleet Valley Strategic Site, including principles to which developments must adhere to.
	Policy CS6: Thames Waterfront	This policy promotes the creation of a range of uses in the Thames Waterfront through setting out the Council's expectations over the Plan period.

		Amongst other matters, the policy: • Promotes *'the creation of a vibrant mixed-use riverfront, incorporating sustainable communities, new employment opportunities, leisure use of the river /riverside and use of the river for sustainable transport'*; • Supports employment uses upon the Swanscombe Peninsula which, at the time of adoption considered an Environmental Technology Park; • Encourages *'proposals which incorporate sustainable river transport uses, utilising the wharf'*; • Seeks to protect and enhance local marshes as areas of biodiversity value and public recreational areas for quiet enjoyment; • Supports leisure uses at Swanscombe Peninsula where they are *'of an outdoor nature, or set in generous greenspace subject to compatibility with adjoining uses and impact on town centres'*; • Supports proposals which *'maximise the tourism potential of Ebbsfleet and provide fast and convenient public transport links to Ebbsfleet station'*; • Encourages built development which reflects the heritage of the area; and • Requires development proposals to demonstrate adequate traffic management measures. The policy is supported by Diagram 7 which identifies Swanscombe Peninsula West as a *'Key Development Site'*, *'Opportunity Area'* and with *'Green Grid Existing'* [referring to Policy CS 14].
	Policy CS7: Employment Land and Jobs	This policy identifies the Council's expectations in terms of job growth over the

		Plan period, setting out both indicative distribution and actions by the Council to escalate early delivery. The policy seeks to achieve a net growth of up to 26,500 jobs.
	Policy CS8: Economic Change	This policy identifies the Council will seek to transform the economy by focussing on growth sectors, including *'e) creative industries, hospitality and leisure'.* The policy identifies specific proposals, including exploring the potential of an Environmental Technology Park on the Swanscombe Peninsula.
	Policy CS9: Skills and Training	This policy sets out intentions to achieve economic transformation including the provision of a local skilled workforce through training, funding, promotion of apprenticeships within developments and supply-chains and educational material.
	Policy CS10: Housing Provision	This policy seeks to meet the housing needs of the Borough by support proposals on land allocated in accordance with the spatial strategy as set out in Policy CS 1. The capacity for each area is identified together with provision for Windfall sites which are to be assessed against set criteria (a-d) including consideration of sustainability, benefits, capacity of infrastructure and site capacity.
	Policy CS11: Housing Delivery	Policy CS 11 seeks to ensure a balanced relationship between homes, jobs and infrastructure through actions the Council will take, including working with developers, service providers, working to achieve the funding to provide facilities and monitoring the delivery of homes and jobs.
	Policy CS12: Network of Shopping Centres	This policy supports a network of shopping centres to be developed which includes Dartford Town Centre, Bluewater, Ebbsfleet/Eastern Quarry and Longfield as the main focus for shopping and leisure activity.

		The policy identifies roles of each centre and notes that the Council will work with developers and grant consent for development that supports these roles.
	Policy CS13: Green Belt	This policy seeks to protect the openness of the Green Belt through resisting inappropriate development and identifies a series of projects aimed at managing the Green Belt.
	Policy CS14: Green Space	This policy seeks to deliver a Green Grid by setting out a series of methods as part of new developments. The policy is supported by Diagram 8 identifying 'Proposed *Green Spaces in Development Sites'* and *'Existing Green Grid Link'* across Swanscombe Peninsula West.
	Policy CS15: Managing Transport Demand	This policy seeks to reduce the need to travel, specifically by car, through requirements on both the Council, stakeholders and developers in relation to development proposals.
	Policy CS16: Transport Investment	This policy seeks to respond to pressures on the transport network through a Strategic Transport Infrastructure Programme and through design progression, developer contributions, partnerships, off-site improvements through Section 106 and Section 278 agreements and through cross-county collaboration.
	Policy CS17: Design of Homes	This policy sets out the Council's approach to achieving quality living conditions for new residential development proposals. The policy sets out a series of criteria to which proposals must adhere and indicates the variety of housing densities applicable.
	Policy CS18: Housing Mix	This policy seeks to ensure an appropriate housing mix to ensure a long-term balance of housing stock for the Council. The policy sets out how the Council will achieve this through the proportion, quality, space, amenity, and accessibility considerations for development

		proposals. The policy also requires new development proposals to demonstrate that they are providing the maximum proportion of Lifetime Home standards.
	Policy CS19: Affordable Housing	This policy seeks to ensure the needs of households requiring affordable housing are met through setting out the site size and percentage of affordable housing delivery for development proposals in urban and rural areas. The policy also makes provision for the type of tenure mix for private developments.
	Policy CS21: Community Services	This policy seeks to provide services for community needs through developer contributions for land and facilities, with expectations for benefits to existing and new communities, phased provision, appropriate distribution, and co-location of services.
	Policy CS22: Sports, Recreation and Culture Facilities	This policy seeks to protect and expand the offer of sports, recreation and culture facilities through site specific initiatives including encouraging leisure uses of an outdoor nature or set within greenspace at Swanscombe Peninsula and a requirement for major proposals to provide community facilities.
	Policy CS23: Minimising Carbon Emissions	This policy aims at minimising carbon emissions through energy efficiency and use of renewable energy by requiring all new developments to meet specific targets, including: energy use, BREEAM rating, Combined Heat and Power (CHP) provision, infrastructure, existing building efficiency, and maximise low/zero carbon generation and supply.
	Policy CS24: Flood Risk	This policy seeks to manage and mitigate flood risk through requiring new development proposals to consider residual risk management, Thames Estuary 2100 Project, Sustainable Urban Drainage Systems (SuDS) requirements, and green infrastructure, where appropriate.

	Policy CS25: Water Management	This policy sets out the Council's aim to manage the supply and quality of water and waste water to protect and enhance the quality of surface water and groundwaters through defined policy requirements.
	Policy CS26: Delivery and Implementation	This policy sets out how the Council will seek to ensure adequate and appropriate infrastructure is provided through working with developers, utilising S106 Obligation and CIL, prioritise planning obligation requirements, and bid for funding.

Table A4-2: Summary of Dartford Development Policies Plan (July 2017)

Document	Policy/page/paragraph	Summary
Dartford Development Policies Plan (July 2017)	Policy DP1: Dartford's Presumption in Favour of Sustainable Development	This policy seeks to ensure all development reflects the NPPFs presumption in favour of sustainable development and accords with polices of the Dartford Development Policies Plan, unless material considerations indicate otherwise.
	Policy DP2: Good Design in Dartford	This is a criteria based policy seeking to ensure development proposals represent high quality design, taking into account local context and constraints.
	Policy DP3: Transport Impacts of Development	This policy seeks to ensure development proposals minimise and manage arising transport impacts, taking into account effects on residential amenity and environment and account for residual impacts.
	Policy DP4: Transport Access and Design	This policy seeks to ensure development proposals are of a design and layout which promotes active travel and public transport, while making provision for vehicular access arrangements, and where appropriate sets out criteria for proposals to meet.
	Policy DP5: Environmental and Amenity Protection	This is a policy seeking to ensure development proposals will not result in unacceptable material impacts on neighbouring uses, environment or public health, accounting for other policies and wider site context. It includes matters relating, but not limited to, air quality; water quality; traffic, access and parking; noise disturbance and vibration; odour; light pollution; overshadowing, overlooking, privacy; land instability; and ground conditions.
	Policy DP6: Sustainable Residential Locations	This policy directs residential development to non-windfall sites in accordance with the Dartford Strategic Housing Land Availability Assessment and Core Strategy Policy CS10: 1 & 2. Where residential development is proposed on windfall sites, these must be in accordance with Core Strategy Policy CS10: 4

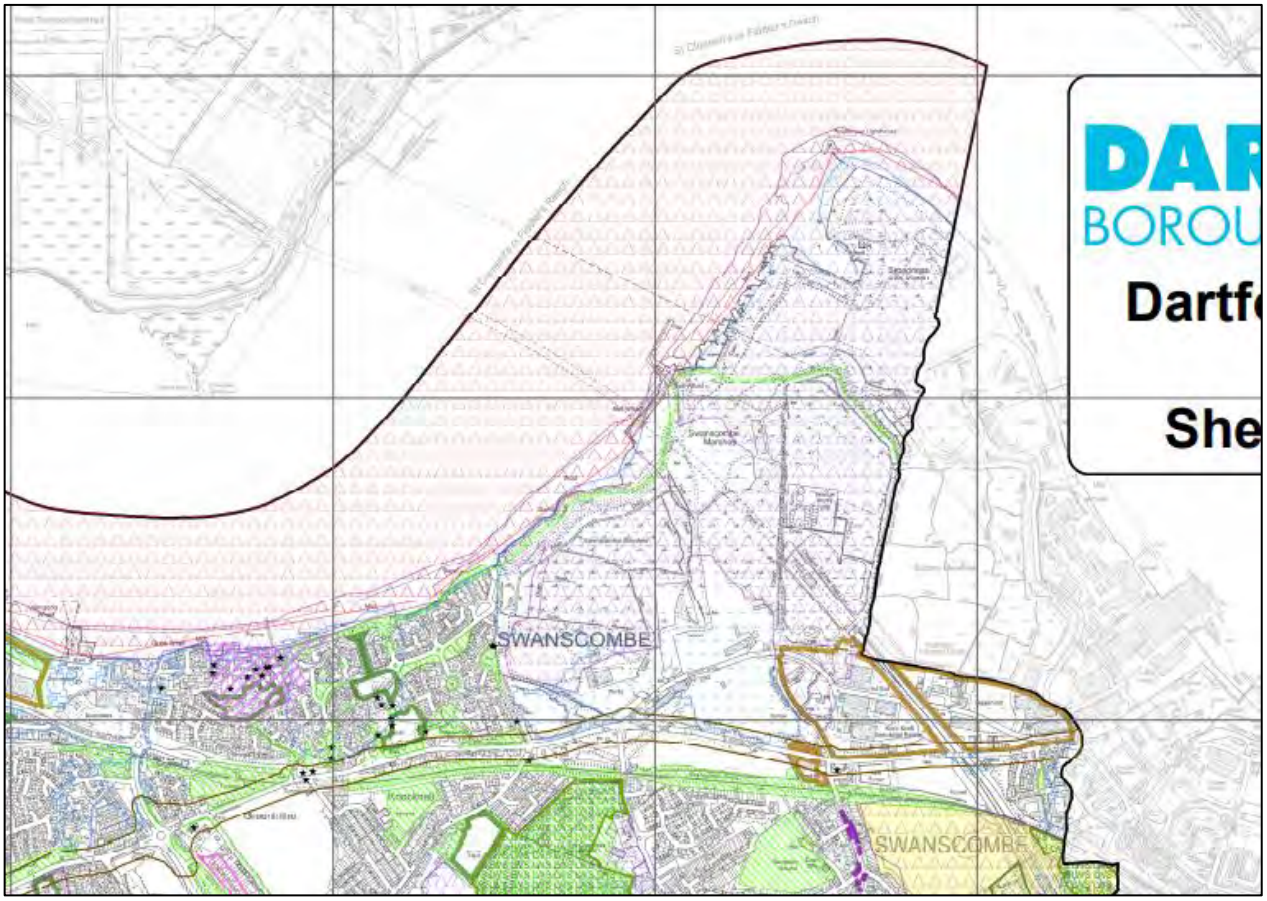
		& 5 and consider the Dartford Housing Windfall SPD, as well as satisfy criteria a) – c) as set out in the policy.
	Policy DP7: Borough Housing Stock and Residential Amenity	This policy sets out the Council's approach to maintaining and providing an appropriate range of housing stock including considerations to garden sizes, retention or enhancement of the character, local environment and amenity of established residential areas, achieving satisfactory quality of residential/housebuilder development and accordance with Policies DP2, DP4, DP5 and DP8.
	Policy DP8: Residential Space and Design in New Development	This policy identifies the criteria to be applied to the design of new residential development taking into considerations such as quality, scale, form of internal and external spaces, and accessible/adaptable dwellings.
	Policy DP9: Local Housing Needs	This policy requires new residential development to deliver an appropriate housing mix of affordable housing types and tenure to meeting local requirements, with considerations of sustainability, location and scale. The policy also requires the provision of affordable homes to be on-site unless exceptional circumstances apply.
	Policy DP11: Sustainable Technology and Construction	This policy seeks to tackle climate change by ensuring development proposals minimise flood risk and natural resource use and increase water efficiency, weighed against individual and cumulative impacts through a series of considerations to which development must account for, including mitigation/management of impacts where appropriate.
	Policy DP12: Historic Environment Strategy	This policy seeks to protect heritage assets and their setting to which development proposals affect through a requirement to protect, conserve and enhance designated and non-designated assets, supported by a heritage statement. The policy also sets out

		criteria to which non-designated heritage assets are assessed.
	Policy DP13: Designated Heritage Assets	This policy seeks to protect designated heritage assets (including listed buildings, conservation areas and scheduled monuments) by assessing the harm or loss resulting from development proposals, weighed against public benefits.
	Policy DP14: Retail and Town Centre Development	This policy seeks to ensure a sequential approach is applied to retail and town centre development proposals in accordance with Policy CS12 which identifies a network of shopping centres. Clause 4 of the policy relates to Impact Assessments Outside of Centres stating that retail development with over 500sqm of floor space will only be permitted where it both satisfies the sequential test and is demonstrated to be acceptable through a retail impact assessment in accordance with national policy.
	Policy DP15: Dartford Town Centre and its Primary Frontage	This policy seeks to revitalise Dartford Town Centre in accordance with Core Strategy Policy CS2. The policy places significant weight to transformational redevelopment proposals that achieve significant enhancements to the quality of the town centre through meeting the objectives of Policy CS2. Clause 2 sets out the considerations of Primary Frontages and their uses in Dartford Town Centre.
	Policy DP16: Dartford Town Centre's Secondary Areas	This policy identifies the uses considered to be appropriate to Dartford Town Centre's Secondary Frontage being A1-A4 uses. The policy sets out a series of criteria to which other uses will be considered with respect to their contribution to the vitality and viability of the town centre. Outside of the designated town centre frontage, Clause 2 of the policy sets out the criteria to which other uses must satisfy.

	Policy DP17: District Centres	This policy seeks to ensure the objectives of the Plan are achieved through promoting community vitality and shopping through supporting shops and community uses in District Centres unless the development would result in less than 50% of the units being retained within Class A1/A2 use or Class A5 is proposed. The policy also notes that applications for other ground floor changes of use will only be permitted in accordance with Policy DP14:5.
	Policy DP18: Neighbourhood Centres	Policy DP18 seeks to maintain shops and essential services for local residents through ensuring that ground floor changes of use in Neighbourhood Centres where two or more Class A1/A2 units are to be retained satisfy Policy DP19 and the proposed use is non-residential and not already provided and the unit is vacant and demonstrated to not be viable for retail uses through sufficient marketing.
	Policy DP19: Food and Drink Establishments	This is a criteria based policy for development proposals involving food and drink uses, introducing assessments against amenity, environmental quality and transport considerations. A second part to the policy seeks to control the location of hot food takeaways.
	Policy DP20: Identified Employment Areas	This policy notes that 'Identified Employment Areas' are important for providing storage, industrial and distribution services, and other business uses. Manor Way, London Road, Galley Hill and Northfleet are all 'Identified Employment Areas'. The policy stipulates that development for non B-class/industrial sui generis uses within Identified Employment Areas will be permitted only where certain criteria are met, including within the three Priority Areas identified in Policy CS1, redevelopment is clearly shown to offer significant overriding local economic and job benefits and that any loss or re-

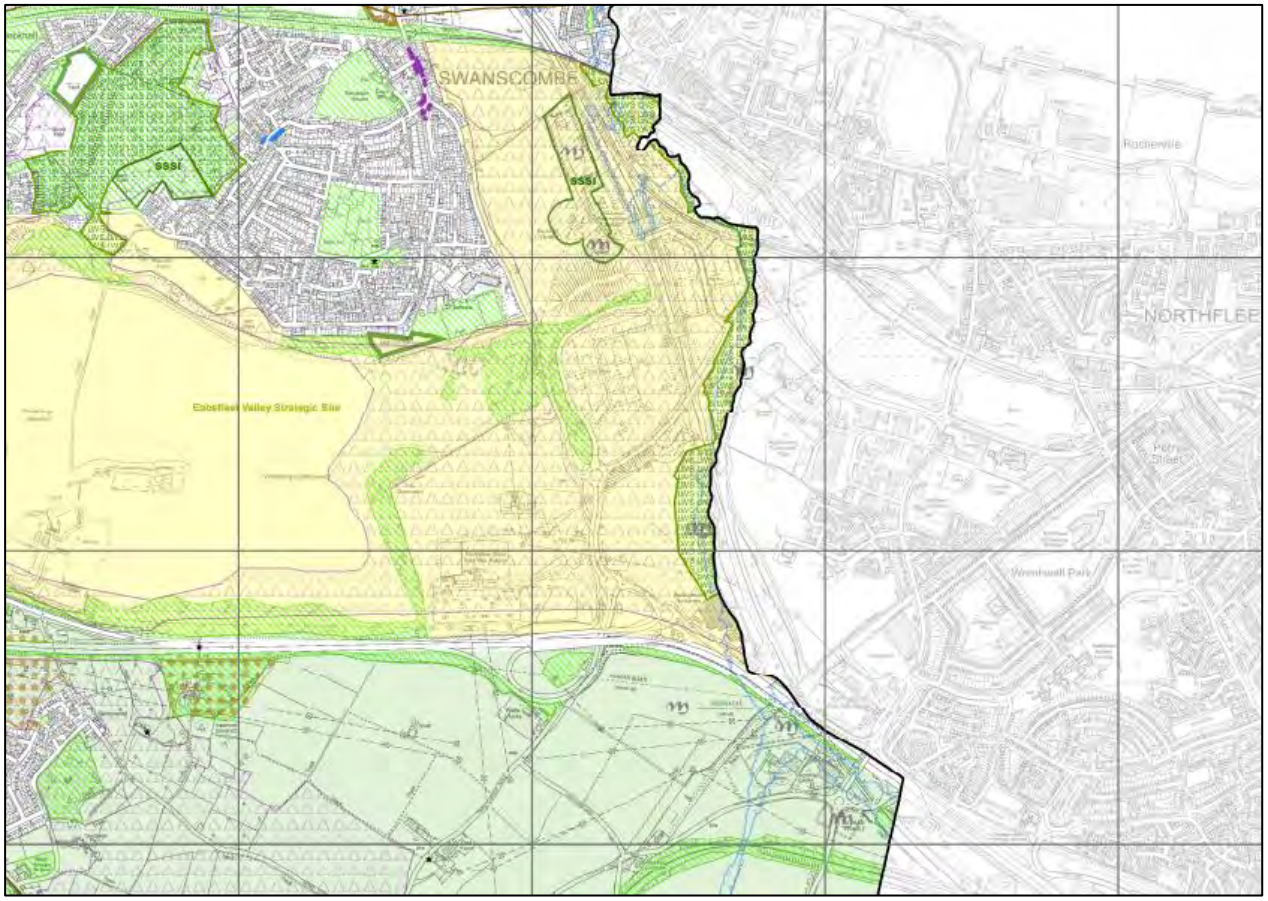
		location of existing employment uses is clearly justified. The policy also seeks to minimise adverse impacts of development proposals within Identified Employment Areas on adjoining uses, local character and the environment through satisfying clauses as defined by the policy.
	Policy DP21: Securing Community Facilities	This policy directs proposals for new community facilities in appropriate locations and of a type and scale that reflects the host community, while seeking to safeguard such facilities and land through appropriate planning mechanism.
	Policy DP22: Green Belt in the Borough	This policy seeks to protect the Dartford Green Belt through resisting inappropriate development assessed against a set of criteria and taking into account other material considerations and clauses.
	Policy DP23: Protected Local Green Space	This policy seeks to maintain Protected Local Green Spaces (PLGS) by resisting development unless special circumstances apply, considering national policy and Policy DP22.
	Policy DP24: Open Space	Criteria based policy whereby development proposals on designated Open Space must satisfy, accounting for constraints and national policy position.
	Policy DP25: Nature Conservation and Enhancement	This policy seeks to protect designated nature conservation sites and biodiversity features by resisting development within or proximity to designated sites. Development proposals are encouraged to preserve or enhance habitats and ecological quality in Biodiversity Opportunity Areas and retain trees wherever possible.

Figure A4-1: Dartford Policies Map – Sheet 2 (East) (July 2017)



Not to scale
Source: Dartford Borough Council

Figure A4-2: Dartford Policies Map – Sheet 2 (East) (July 2017)



Not to scale
Source: Dartford Borough Council

Emerging local planning policy

Table A4-3: Summary of New Local Plan (Preferred Options) (January 2020)

Document	Summary
New Local Plan (Preferred Options) (January 2020)	None of the policies contained in the existing Dartford Core Strategy (September 2011) are expected to remain wholly unchanged in the New Local Plan. The existing policies in the Dartford Development Policies Plan (July 2017) contain more detail and is considered generally up to date and approximately half are expected to be replicated in the emerging Local Plan, with some refinements. Policies the Council consider applicable for inclusion in the emerging New Local Plan are as follows: • Policy DP2: Good Design in Dartford • Policy DP3: Transport Management • Policy DP4: Transport Access and Design • Policy DP5: Environmental and Amenity Protection • Policy DP7: Borough Housing Stock and Residential Amenity • Policy DP12: Dartford's Historic Environment Strategy • Policy DP13: Designated Heritage Assets • Policy DP19: Food and Drink Establishments • Policy DP21: Securing Community Facilities • Policy DP22: Green Belt in the Borough • Policy DP23: Protected Local Green Space Specifically with regards to the Swanscombe Peninsula, there is the indication that this is likely to be dealt with by a criteria based area policy, which can acknowledge the highly varied nature of the land, look long-term and be flexible to land availability, infrastructure requirements and potential action to address existing site constraints. The document provides an overview of the Swanscombe Peninsula from the Council's perspective and identifies their preferred options for this area. This replicated as follows: *'The Peninsula is a largely open area of low-lying marsh land located between Swanscombe and the River Thames on the eastern boundary of*

	the Borough. Parts of the site are heavily contaminated by previous industry and there are current employment uses centred around Manor Way and Lower Road. It is within the Ebbsfleet Garden City area boundary. *We are aware of proposals for an internationally important entertainment resort but we have a responsibility in our Local Plan to consider alternative uses. The creation of a resort at Swanscombe Peninsula would have many advantages, particularly for jobs, skills and local leisure provision, but we must ensure that the local transport infrastructure is protected and that any proposal benefits the wider community.* *Whilst we wait for these proposals we have given consideration to other alternatives and our preferred option is for an extensive ecological park combined with a sensitively integrated, lower density mixed use development to the south of the site near existing commercial uses. This would include outdoor/ leisure uses with retention of local jobs and some development on previously developed parts of the site.* *A further alternative is to not specify potential uses but to include a criteria based policy to deal with any proposals that may come forward.'*

Other policy documents

Table A4-4: Summary of other Dartford policy documents

Document	Summary
Parking Standards Supplementary Planning Document (July 2012)	This document provides guidance on parking standards in the Borough setting out requirements for parking spaces for bicycles, vehicles and provision for those with impaired mobility. The document also provides guidance on design and management of parking areas.

GRAVESHAM BOROUGH COUNCIL

Existing local planning policy

Table A4-5: Summary of Gravesham Local Plan Core Strategy (September 2014)

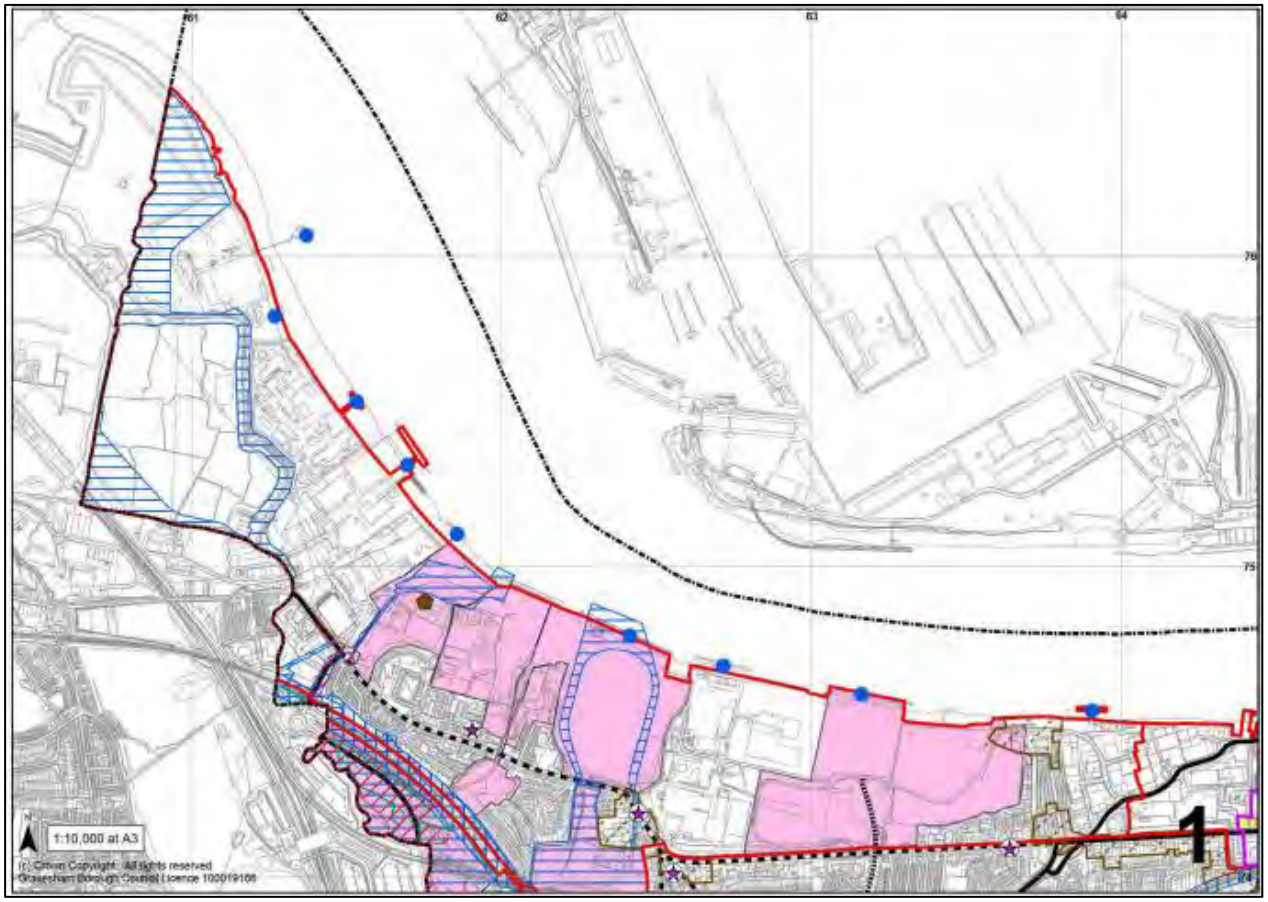
Document	Policy/page/paragraph	Summary
Gravesham Local Plan Core Strategy (September 2014)	Policy CS01: Sustainable Development	This policy seeks to ensure development proposals reflect the NPPFs presumption in favour of sustainable development and seeks to ensure applications accord with polices of the Gravesham Local Plan Core Strategy unless material considerations indicate otherwise.
	Policy CS02: Scale and Distribution of Development	This policy sets out the development strategy of the Borough, including distribution of housing numbers and employment floorspace, priorities for achieving the strategy and proposed developments in rural settlements. Northfleet Embankment and Swanscombe Peninsula East is identified as an Opportunity Area. The policy looks to promote regeneration by *'prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area.'*
	Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area	This policy identifies the potential opportunities for the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area and sets out requirements for future development proposals in this area. It recognises the 'substantial *opportunity for major riverside regeneration in Gravesham.'* The policy notes that proposals for the Swanscombe Peninsula East Undeveloped Area will be subject to a comprehensive masterplan approach dealing with the issues relating to flood risk, transport, access, ground conditions, proximity to existing industrial uses, air quality, biodiversity, utilities, navigation and the presence of the HS1 railway line.

		Paragraph 4.4.3 notes that this is a large area of land which projects northwards into a bend of the River Thames on the boundary between the Boroughs of Dartford and Gravesham. It describes the land as mainly low lying and comprises a mixture of residual marsh used for agriculture/grazing and raised ground. The paragraph goes onto to note the possible constraints that exist to any development potential associated with this land, to include transport access; ground conditions; proximity to existing industrial uses; biodiversity; utilities; navigations; and railways with specific reference made to HS1 which severs the southern part of the marsh. Paragraph 4.4.4 states that *'the Council considers that there is development potential at Swanscombe Peninsula'*. Recognising the constraints associated with the land, it is acknowledged that any development potential is likely to be long term and any development should be proposed with a masterplan approach to include development phasing and provision pf a new highway link to relieve existing accessibility to the peninsula. The paragraph also suggests potential uses to include industrial/commercial and residential development. See Figure A4-5 (Northfleet Embankment and Swanscombe Peninsula East Opportunity Area).
	Policy CS06: Ebbsfleet (Gravesham) Opportunity Area	This policy identifies the potential opportunities for the Ebbsfleet (Gravesham) Opportunity Area subject to riverside regeneration and sets out requirements for future development proposals in this area.
	Policy CS07: Economy, Employment and Skills	This policy seeks to secure new employment floorspace over the Plan period through specific proposals, including the delivery of additional employment-led mixed use development subject at Swanscombe Peninsula.

	Policy CS08: Retail, Leisure and the Hierarchy of Centres	This policy sets out the Council's approach to protecting and enhancing local centres and creating new local centres with specific focus on Gravesend Town Centre. The policy also requires proposals for leisure, entertainment facilities and the more intensive sport and recreation uses to be subject to an impact assessment.
	Policy CS09: Culture and Tourism	This policy seeks to maximise culture and tourism activity with a focus on development proposals of this kind being directed to Gravesend Town Centre in the first instance as a sequentially preferred location.
	Policy CS10: Physical and Social Infrastructure	This policy seeks to protect, retain and enhance existing physical and social infrastructure and requires proposed development to contribute toward new or improved infrastructure, subject to viability considerations.
	Policy CS11: Transport	This policy requires new development proposals to mitigate impact on transport networks and as appropriate, prepare transport assessments and plans to deliver sustainable travel. The policy also makes provision for parking, public transport, walking and cycling, and wider transport proposals including support for proposals which facilitate the River Thames for passenger transport to the Borough.
	Policy CS12: Green Infrastructure	This policy introduces the creation of a multifunctional linked network of green spaces through the Strategic Green Infrastructure Network, with consideration of development proposals on constraints including biodiversity, protected or priority habitats/species and landscape character and valued landscapes.
	Policy CS13: Green Space, Sport and Recreation	This policy seeks to protect and make provision for the quantity, quality and accessibility of green space, playing pitches and other sports facilities, through a set of

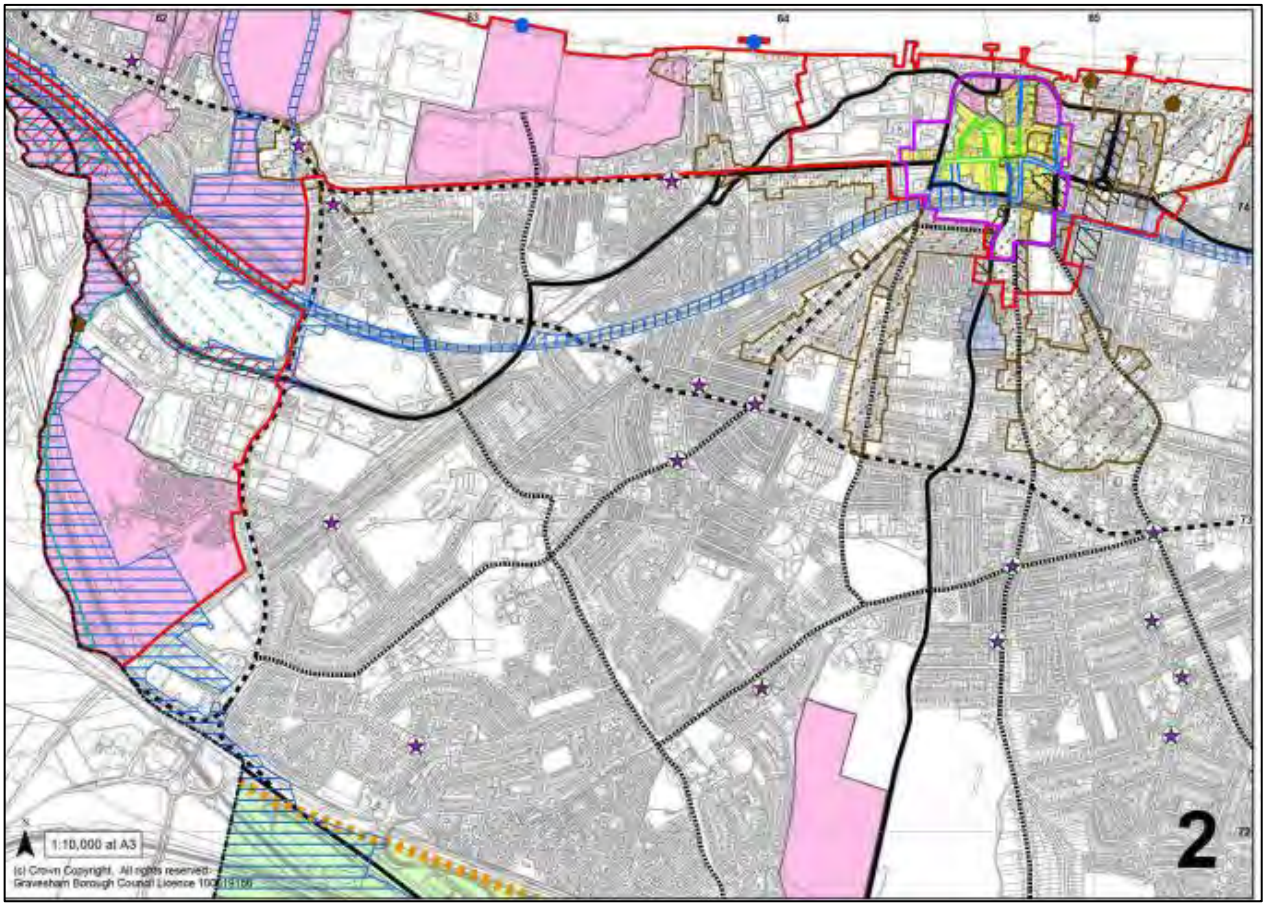
		standards applicable to all new development proposals.
	Policy CS14: Housing Type and Size	This policy sets out the Council's intention to protect the mix of housing in the existing housing stock and sets an expectation that new housing development will provide a range of dwelling types and sizes, considering aspects such as existing character of the area and evidence of local need.
	Policy CS15: Housing Density	This policy promotes housing sites to be delivered at a variety of densities with consideration to location, accessibility and character. The policy requires new housing development to be of a density consistent with achieving good design subject to overriding considerations including urban and rural scale development.
	Policy CS16: Affordable Housing	This policy identifies the thresholds whereby affordable housing will be required on new housing development sites and defines the percentage of affordable housing and tenure mix. The policy notes that development will be subject to site viability and tenure mix and also makes provision for development in the Green Belt.
	Policy CS18: Climate Change	This policy sets out the Council's approach to climate change and environmental improvements categorised into sub-headings covering flood risk, water quality, sustainable drainage and surface water run-off, water demand management and carbon reduction.
	Policy CS19: Development and Design Principles	Criteria based policy to which new development proposals must meet to deliver visually attractive, fit for purpose and locally distinctive developments.
	Policy CS20: Heritage and the Historic Environment	This policy seeks to preserve and, where appropriate, enhance the Borough's heritage assets with a particular focus on assets most 'at risk'.

Figure A4-3: Gravesham Local Plan Core Strategy – Policies Map (September 2014) (Sheet 1)



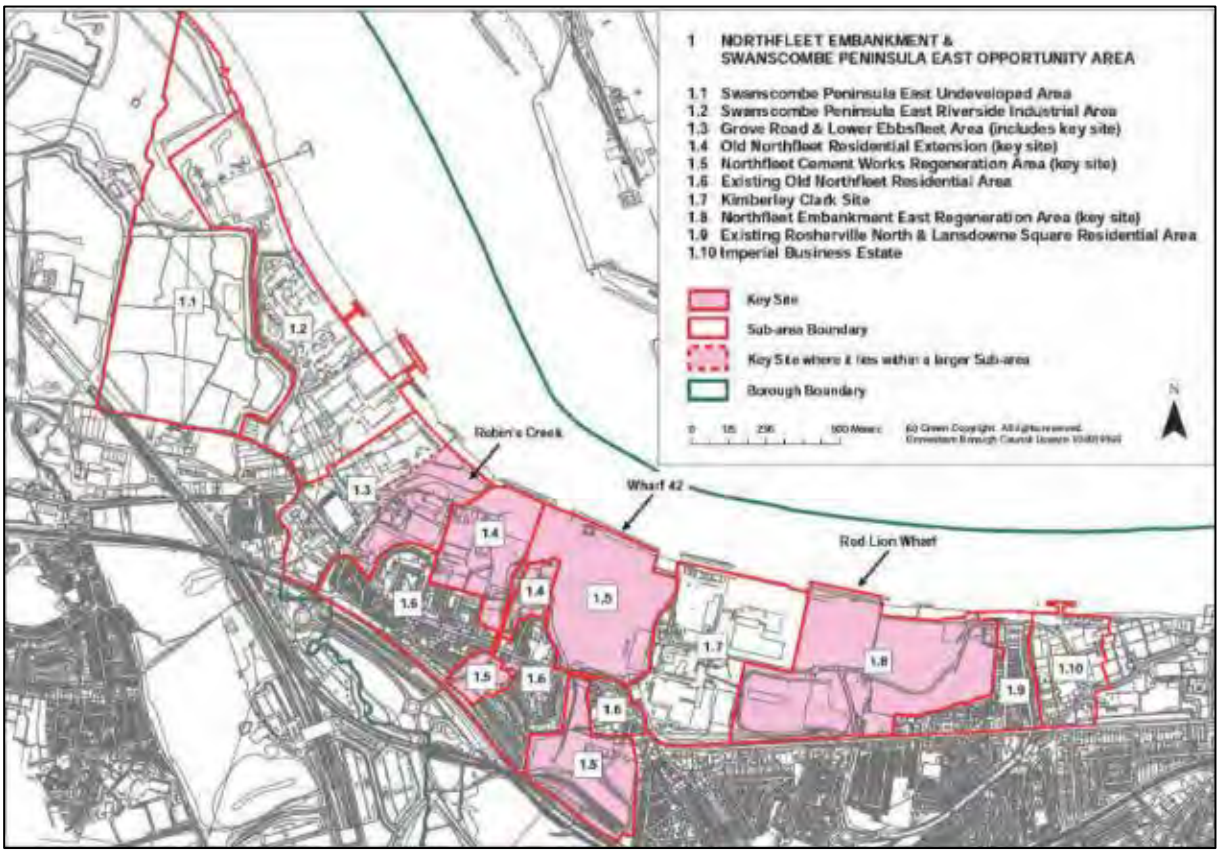
Not to scale
Source: Gravesham Borough Council

Figure A4-4: Gravesham Local Plan Core Strategy – Policies Map (September 2014) (Sheet 2)



Not to scale
Source: Gravesham Borough Council

Figure A4-5: Gravesham Local Plan Core Strategy (September 2014) Figure 4: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area


1 NORTHFLEET EMBANKMENT & SWANSCOMBE PENINSULA EAST OPPORTUNITY AREA
1.1 Swanscombe Peninsula East Undeveloped Area
1.2 Swanscombe Peninsula East Riverside Industrial Area
1.3 Grove Road & Lower Ebbsfleet Area (includes key site)
1.4 Old Northfleet Residential Extension (key site)
1.5 Northfleet Cement Works Regeneration Area (key site)
1.6 Existing Old Northfleet Residential Area
1.7 Kimberley Clark Site
1.8 Northfleet Embankment East Regeneration Area (key site)
1.9 Existing Rosherville North & Lansdowne Square Residential Area
1.10 Imperial Business Estate
Key Site
Sub-area Boundary
Key Site where it lies within a larger Sub-area
Borough Boundary
Roben's Creek
Wharf 42
Red Lion Wharf

Not to scale
Source: Gravesham Borough Council

Table A4-6: Summary of Gravesham Local Plan First Review (Saved Policies) (November 1994)

Document	Policy/page/paragraph	Summary
Gravesham Local Plan First Review (Saved Policies) (November 1994)	Policy S3: Maintenance of Shopping Frontages	This policy seeks to protect shopping street frontages as indicated on the Proposals Map from changing use other than shopping (Use Class A1) at ground floor level.
	Policy S4: Non-shopping Uses in the Shopping Areas	This policy makes provision for the change of use of shopping street frontages indicated on the Proposals Maps in Town Centre Shopping Areas (including uses within Use Class A2) providing the number of buildings in such use in a particular length of street is not excessive.
	Policy S7: Hot Food Shops and Restaurants and other A3 uses	This policy sets out the criteria for proposals to change the use of retail shops to Class A3 Use and seeks to control environmental disturbance of such uses by way of planning condition.
	Policy TC2: Listed Buildings	This policy sets out the Council's approach to proposals affecting listing buildings. The policy sets out guidelines for proposals which involve the demolition, alteration or change of use of listed buildings.
	Policy TC3: Development Affecting Conservation Areas	This policy sets out the Council's approach to proposals affecting conservation areas. The policy considers a proposals impact on the conservation area against the positive contribution made and also considers demolition of unlisted buildings in conservation areas.
	Policy TC7: Other Archaeological Sites	This policy seeks to protect archaeological important sites and considers aspects including preservation, investigation and recording. The Council may also require an assessment of archaeological or historic importance and impact of the development.
	Policy TC8: Advertisement Control	This policy seeks to protect public safety and amenity through examining proposals for advertisement consent against the Council's

		adopted policy guidelines for advertisement control and displays.
	Policy TC9: Shopfronts	This policy resists development proposals which result in existing shopfronts of traditional design and material being lost and also resists the installation of security grills and shutters on the exterior of shopfronts.
	Policy LT6: Additional Open Space in New Housing Development	This policy sets out the Council's expectation for new housing development to make provision for open space and play space appropriate in scale considering the provision and proximity of existing open space in the locality.
	Policy T1: Impact of Development on Highway Network	This policy seeks to ensure all proposed development is adequately served by the highway network identified on the Proposals Map and seeks to consider impact on the transports system and environment from traffic generated by new development.
	Policy T2: Impact of Development on Highway Network	This policy seeks to channel all traffic travelling through Gravesham onto the primary and district distributors.
	Policy T3: Impact of Development on Highway Network	This policy seeks to resist proposals which generate significant volumes of commercial vehicle traffic if not well related to the primary and district distributor network.
	Policy T4: Impact of Development on Highway Network	This policy seeks to resist proposals outside the confines of the built up area that generates significant vehicular or pedestrian traffic.
	Policy T5: Access to the Identified Highway Network	This policy resists the formation of new accesses or the intensification of use of existing accesses to the road forming the highway network as shown on the Proposals Map except where no danger would arise and the access can be created in a location and standard acceptable to the Local Planning and Highway Authorities.

	Policy T6: South Thames-side Development Route (A226 Diversion)	This policy seeks to safeguard the part of the South Thames-side Development Route (A226 Diversion) as shown on the Proposals Map by resisting proposals which prevent or impede the implementation of this road.
	Policy T9: Housing Estate Layouts	This policy sets out the Council's expectation of the highway layout of new residential development through compliance with the Kent Design Guide and the Vehicle Parking Standards, while also encouraging 'Traffic Calming' measures.
	Policy P3: Vehicle Parking Standards	This policy expects development to make provision for vehicle parking in accordance with the KCC Vehicle Parking Standards and should normally be on site. The policy also makes provision for Class B1 development and expects such proposals to comply with the standard for offices and requires lorry parking and manoeuvring areas to be provided unless agreed with the Council.

Emerging local planning policy

Table A4-7: Summary of Part 1: Local Plan Core Strategy Partial Review and Site Allocations Document (October 2020)

Document	Policy/Page/Paragraph	Summary
Part 1: Local Plan Core Strategy Partial Review and Site Allocations Document (October 2020)	Allocations identified through proposed site allocation maps. See Figures 11, 12 and 19, reproduced below.	See figures below identifying allocations within proximity to Swanscombe Peninsula and the London Resort.

Table A4-8: Summary of Part 2: Draft Development Management Policies Document (October 2020)

Document	Policy/Page/Paragraph	Summary
Part 2: Draft Development Management Policies Document (October 2020)	Proposed Policy RE 2: Complementary, Cultural and Tourism Uses in Gravesend Town Centre	This policy makes provision for culture and tourism uses in accordance with the NPPF sequential test. The policy notes that proposals for such uses outside of the Gravesend Town Centre boundary but within the wider Gravesend Town Centre Opportunity Area will be considered on their own merits, considering factors such as location, use and availability of other sites.
	Proposed Policy RE 4: Food and Drink Establishments	This is a criteria based policy to which proposals for food and drink establishments must demonstrate compliance. Proposals must have regard to impacts on amenity, pollution, servicing and parking, viability and vibrancy of retail frontage or centre.
	Proposed Policy INF 1: Route Safeguarding	This policy seeks to safeguard the land identified in the Local Plan Policies Map for the development proposals listed (including Crossrail extension; HS1; Thames Way dualling in Ebbsfleet; Lower Thames Crossing; and A2 Ebbsfleet junction).
	Proposed Policy INF 2: Transport Design Principles	This policy sets out the considerations to achieving sustainable transport principles in new development proposals through a series of criteria and design requirements.
	Proposed Policy INF3: Understanding and Mitigating Transport Impacts	This policy identifies the mitigation of transport impacts arising from development proposals and details transport considerations proportionate to the proposal.
	Proposed Policy INF 4: New Accesses and Junctions	This policy makes provision for new or altered accesses and junctions as part of development proposals and identifies criteria for such proposals to accord to be acceptable including consideration of impacts.
	Proposed Policy GI 1: Open Space, Playing Pitches and Sports Facilities Retention	This policy sets out the requirements for proposals which include the redevelopment or change of use of open space, playing pitches and sports facilities.
	Proposed Policy GI 2: Open Space, Playing	This policy sets out the requirements for development proposals to provide adequate

	Pitches and Sports Facilities Provision	open space, sports and recreation facilities commensurate with the level of development proposed.
	Proposed Policy GI 3: Local Green Spaces	This policy denotes the areas designated as Local Green Spaces as shown on the Policies Maps and protects such spaces in accordance with the requirements of the NPPF.
	Proposed Policy GI 4: Trees, Hedgerows and Woodland	This policy seeks to protect and retain existing trees, hedgerows and woodland and makes provision for the consideration of such features in new development proposals to improve sustainability.
	Policy GI 5: Landscape Character	This policy sets out the expectations for development proposals to contribute to and enhance landscapes through high-quality design, taking into consideration landscape character and any adverse impacts of proposals, to which applications should be accompanied by an LVIA. The policy also sets out the considerations of development proposals on the AONB, with specific reference to the Kent Downs AONB.
	Policy GI 6: Biodiversity	This policy seeks to conserve and enhance biodiversity and ecological sites through ensuring developing proposals achieve measurable net gains for biodiversity in accordance with national policy and guidance, and demonstrating the mitigation hierarchy and justification to any unavoidable impacts. The policy also sets out the requirement for proposals resulting in significant harm to biodiversity which cannot be avoided, mitigated or compensated unless material considerations indicate otherwise.
	Policy FW 1: Managing Water Quality	This policy supports proposals to enhance water quality, whereas any adverse impact on water quality arising from development will require an assessment detailing the nature and scale of the impacts and how these will be addressed. Unacceptable reduction in water quality will result in a proposal being refused.

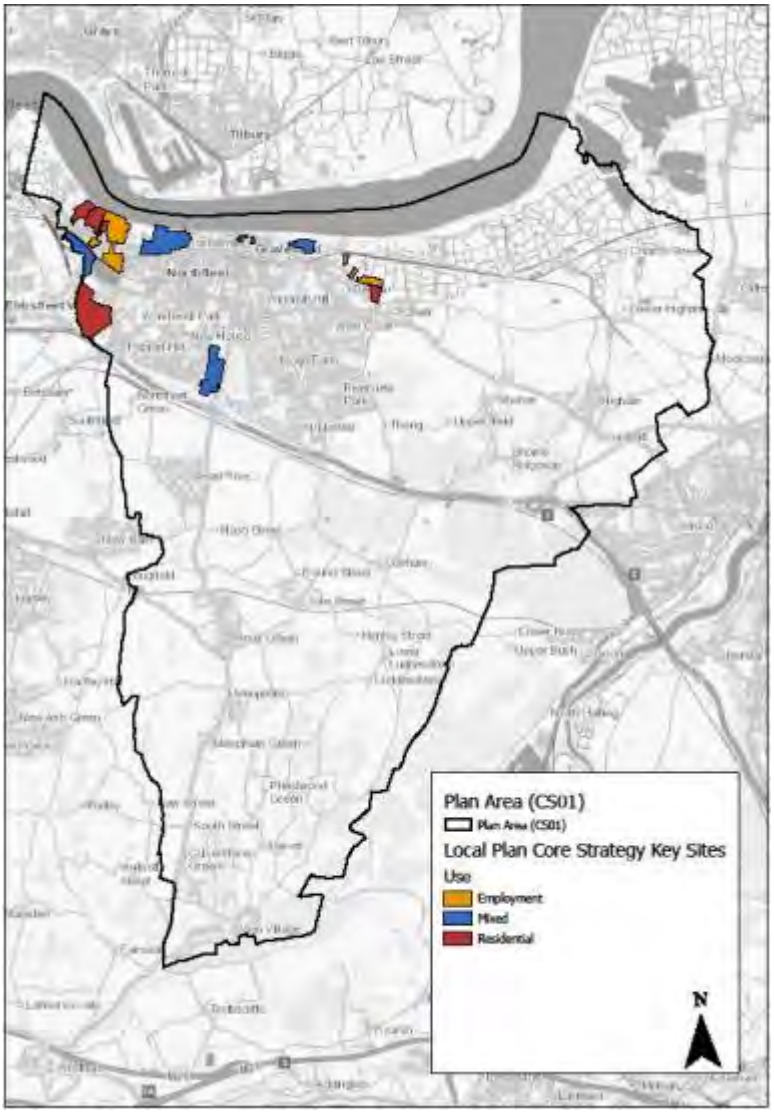
	Policy FW 2: Managing water supply and in new development	This policy sets out that major development proposals will be required to demonstrate an adequate water supply to serve the development, including any upgrades required to water supply infrastructure to support the development. The policy also requires new residential development proposals to be designed to achieve the minimum water efficiency in accordance with Building Regulations. Proposals for non-residential development above 1000 sqm of floor space must be designed and fitted to meet BREEAM excellent standard for water efficiency and include water collection and reuse provision.
	Policy FW3: Managing Flood Risk	This policy sets out flood risk is managed and applications will be determined in accordance with national planning policy and guidance, while seeking an overall reduction in flood risk where applicable. An FRA will be required for development at risk of flooding taking into account development lifetime and climate change factors in accordance with recent UK Climate Projections. The policy also require flood protection and mitigation measures appropriate to the nature and scale of development and discusses flood resilience for proposals 'at risk' and Flood Risk Management Plans will be required on a case by case basis. The policy also requires detailed evidence for any new flood defence infrastructure or upgrades to existing and also states that the Council will prioritise any works to flood defence infrastructure over other uses where relevant.
	Policy FW 4: Managing Waste Water Drainage	This policy has a presumption in favour of new development to discharge waste water to public sewer unless unfeasible, whereby criteria must be met. Major development will need to demonstrate adequate waste water capacity and any upgrades required to waste water infrastructure details should be provided. The policy also discusses nuisance and any constraints to the operation of public

		waste water treatment plants which are considered essential infrastructure.
	Policy FW5: Managing Surface Water Drainage	This policy sets out the requirements for managing surface water drainage including SuDS. The policy requires major development proposals to include a Surface Water Strategy and to be prepared in accordance with the KCC Drainage and Planning Policy Statement and in consultation with the Lead Local Flood Authority. In all cases there is a requirement for surface water run-off from new development to have no greater adverse impact than the existing use as a minimum. The policy also considers system maintenance, planning conditions and details pertaining to the incorporation of improving surface water systems in the design of proposals.
	Proposed Policy AM 1: Air Quality	This policy requires development proposals which may individually or cumulatively increase air pollution levels to submit an air quality assessment including details set out. Major development causing unacceptable air quality impacts will require the provision of an emissions mitigation assessment having regard to mitigation measures.
	Proposed Policy AM 2: Contaminated Land	This policy requires development proposal on land known or likely to be contaminated to be accompanied by a contaminated land assessment and remediation strategy, if necessary, to which best practice and industry standards should be used.
	Proposed Policy AM 3: Light Pollution	This policy requires a lighting report for proposals involving the installation of outdoor artificial lighting, to include a number of considerations. The policy also makes provision for development in the Green Belt and Kent Downs AONB. Unless otherwise justified, proposals involving such lighting will only be permitted where no unacceptable adverse impact will occur to a number of aspects including amenity, highway safety etc.

	Proposed Policy AM 4: Sunlight and Daylight within New Development	This policy requires all new development to ensure adequate levels of daylight and sunlight are available to occupants and those neighbouring the development. The policy identifies that a daylight and sunlight report will be required where requirements of the policy are in doubt.
	Proposed Policy AM5: Noise and Vibration	This policy requires development proposals generating noise and/or vibration which may impact sensitive receptors to be supported by a noise/vibration assessment to demonstrate acceptable impacts including mitigation if necessary.
	Proposed Policy DES 3: Tall and Bulky Buildings	This policy details the requirements for proposals involving tall and bulky buildings to include a statement including a proportionate analysis and justification for the proposal, considering various factors as noted in the policy. The policy also requires proposals to consider design of tall buildings and wider context.
	Proposed Policy DES 4: Designing for a High Quality and Accessible Riverside	This policy requires a high quality of design both sensitive to and appropriate to context and function on all sites fronting the River Thames. The policy also sets out requirements for residential development along the riverside and also discusses flood defence schemes, biodiversity and foreshore archaeology considerations as part of development proposals.
	Proposed Policy HER 3: Conservation Areas	This policy sets out how the Council will assess proposals in or adjoining Conservation Areas having regard to the adopted Conservation Area Appraisals and Management Plans and other policies within the Development Plan. The policy also requires that new development aims to preserve or enhance the character and local distinctiveness of the historic environment and sets out the considerations for development affecting the setting or, or views into and out of, a Conservation Area. In addition, the policy goes on to note that

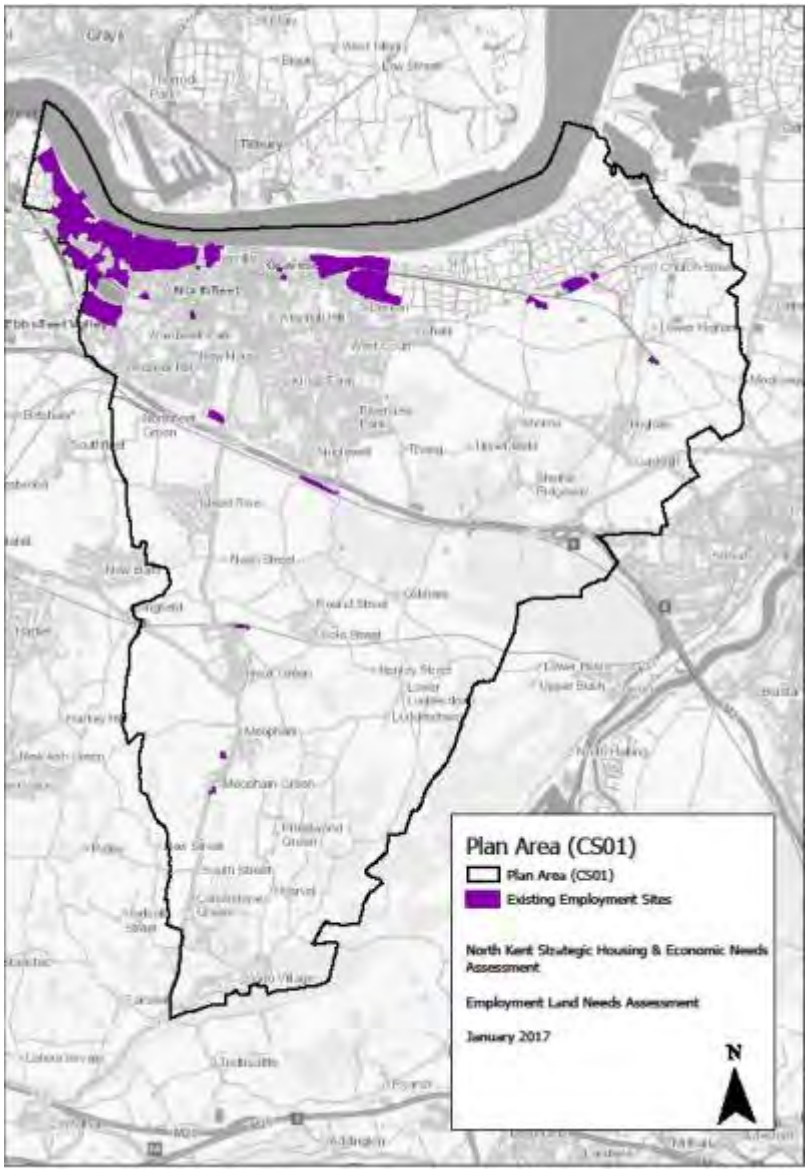
		consideration should also be given possible existence of buried archaeology.
	Proposed Policy HER 4: Archaeology	This policy seeks to protect the archaeological and historic integrity of designated heritage assets and other important sites through requiring an assessment of any asset where a proposed development may cause an impact. The policy continues to discuss how any impacts on heritage assets will be assessed through weighing up the significance of the asset against public benefits of the proposal. The policy also makes provision for scenarios where preservation in situ is not possible or justified, requiring preservation by record.

Figure A4-6: Figure 11: Map of Local Plan Core Strategy Key Sites



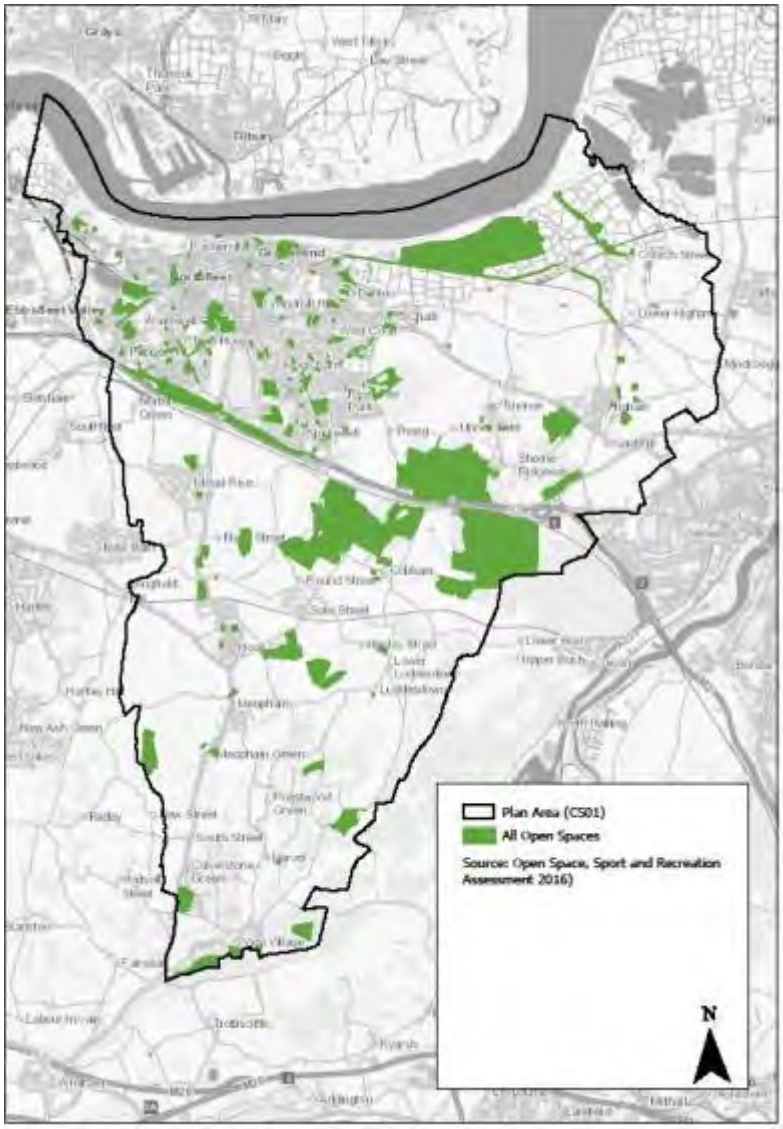
Not to scale
Source: Gravesham Borough Council

Figure A4-7: Figure 12: Map of existing employment areas



Not to scale
Source: Gravesham Borough Council

Figure A4-8: Figure 19: Map of Open Spaces in Gravesham



Not to scale
Source: Gravesham Borough Council

Other policy documents

Table A4-9: Summary of other Gravesham policy documents

Document	Summary
SPG 1: Landscape Character (July 2006)	This document provides further detail and elaborates on the details of the following policies: • Policy EN3: Protecting and Enhancing Countryside Character • Policy EN4: Areas of Outstanding Natural Beauty and the Heritage Coast • Policy EN5: Special Landscape Areas
SPG 2: Biodiversity Conservation (July 2006)	This document provides further detail and elaborates on the details of the following policies: • Policy EN6: International and National Wildlife Designations • Policy EN7: County and Local Wildlife Designations • Policy EN8: Protecting, Conserving and Enhancing Biodiversity • Policy EN9: Trees, Woodland and Hedgerows
SPG 3: Archaeology in Historic Towns (July 2006)	This document provides further detail and elaborates on Policy QL7: Archaeological Sites.
SPG 4: Kent Vehicle Parking Standards (July 2006)	This document provides further detail and elaborates on the details of the following policies: • Policy TP3: Transport and the Location of Development • Policy TP19: Vehicle Parking Standards

EBBSFLEET DEVELOPMENT CORPORATION

Existing

Table A4-10: Summary of Ebbsfleet Garden City Implementation Framework (2017)

Document	Policy/page/paragraph	Summary
Ebbsfleet Garden City Implementation Framework (2017)		As that the EDC boundary extends across two local authorities (Dartford and Gravesham), the Framework seeks to remain in accordance with the development plans documents of Dartford Borough Council, Gravesham Borough Council and Kent County Council.
	Page 11	The timeline references the NSIP status of the London Resort in May 2014.
	Page 54	In terms of Ebbsfleet International Station, the Framework states *'The evolution of Ebbsfleet International station from a Park and Ride site into a central transport hub is fundamental to delivering a higher modal share for rail within the area. This will provide an improved interchange with upgraded Fastrack and local bus services, walking and cycling routes, and better connections with Northfleet Station and Swanscombe stations, which in time may have better service provision through an upgrade to Crossrail services or other metropolitan train services. The central transport hub would also benefit from further enhancement to the high speed service between Ebbsfleet and St Pancras in terms of capacity and frequency.'*
	Page 83	This page includes a key diagram illustrating the Framework and various illustrative diagrams within the Framework. The diagram notes *'London Resort road route alignment for further investigation'* and *'London Resort underground road alignment for further investigation'*

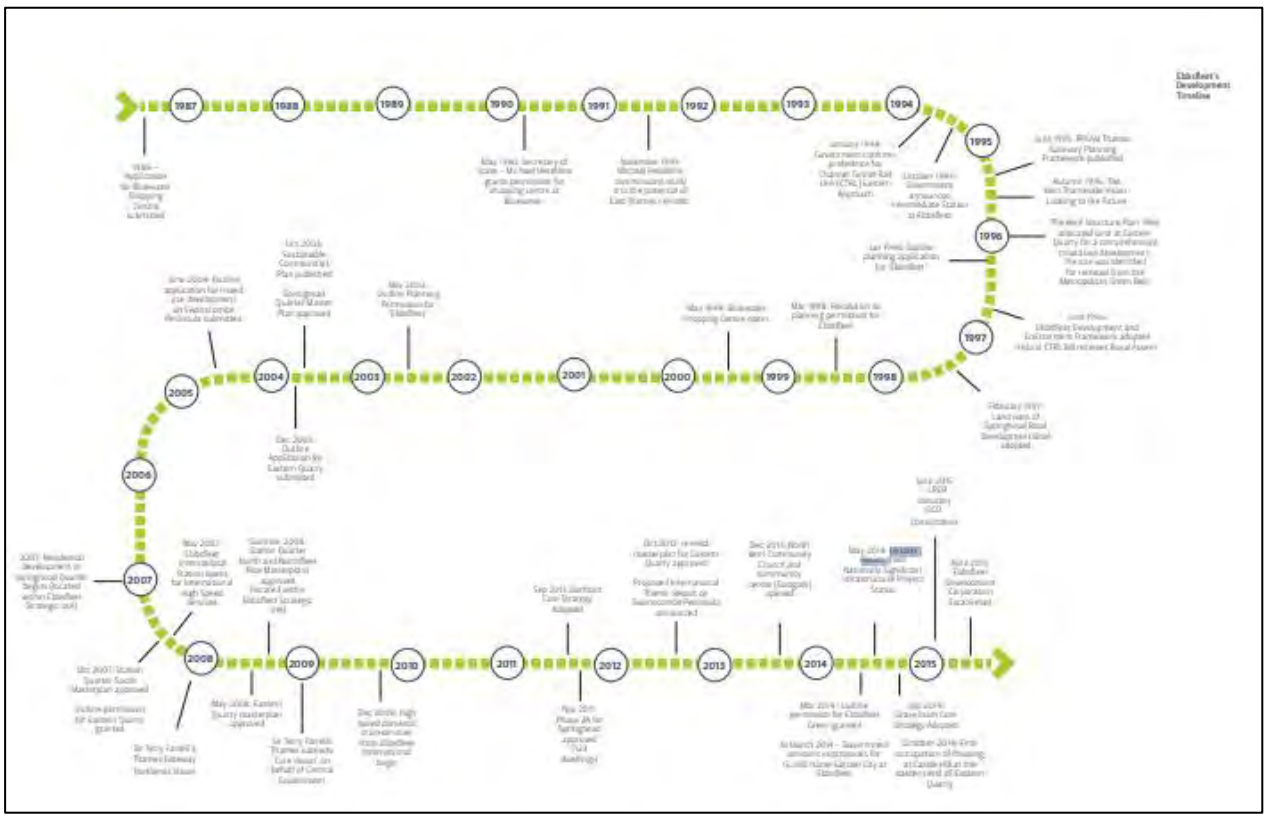
	Page 86	The Framework identifies that four distinct areas have been established to promote and coordinate development across the Ebbsfleet area. One of these areas is Ebbsfleet Central where the Framework identifies that *'The heart of Ebbsfleet, running along the Ebbsfleet River valley with Ebbsfleet International Station at its core. This area incorporates Station Quarters North and South, Northfleet Rise and Springhead Quarter as defined within the Ebbsfleet planning consent promoted by EIGP. The Framework seeks to establish a vibrant and dynamic centre, and a major commercial hub supported by a diverse mix of residential, educational and leisure uses, with associated bars, restaurants and convenience shopping to create an active and lively street scene.'*
	Page 88	This page seeks to identify the relevant planning policies affecting Ebbsfleet Central. It identifies the following: • Dartford Borough Council Core Strategy (September 2011) - Policy CS 4: Ebbsfleet to Stone Priority Area - Policy CS 5: Ebbsfleet Valley Strategic Site • Gravesham Local Plan Core Strategy (September 2014) - Policy CS06: Ebbsfleet (Gravesham) Opportunity Area
	Pages 124-129 .	These pages relate to the Swanscombe Peninsula. The Framework states that '*the site is currently being promoted for a major leisure destination under the NSIP process to deliver a global entertainment resort. It will also remain a focus for environmental and ecological enhancement.'*

		It further states *'the majority of the site within EDC's red line boundary is included within the London Resort development NSIP pre-submission proposal'*
	Page 124	This page sets out the planning policy associated with Swanscombe Peninsula and includes the Dartford Borough Council Core Strategy (September 2011) Policy CS 6: Thames Waterfront. In this regard the Framework states *'Swanscombe Peninsula West features in Dartford's Core Strategy 2011 as an area of potential development within the broader Waterfront Priority area. Specifically policy requires development at the site to share local facilities with Ingress Park; that the ecology of the Peninsula is preserved; and is supportive of employment and outdoor leisure uses. The Strategic Housing Land Availability Assessment whilst identifying the potential for up to 800 homes, notes that development would require a coordinated planning framework for both the west and east peninsula. Additionally employment floorspace estimates used to support the Core Strategy assumed potential for renewed and additional employment floorspace at the site.'* It also includes Gravesham Local Plan Core Strategy (September 2014) Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area. In this regard it notes '*The eastern edge of Swanscombe Peninsula is located within Northfleet Embankment and Swanscombe Peninsula East Opportunity Area which sets out a substantial opportunity for major riverside regeneration in Gravesham. The Opportunity Area contains several subareas each containing specific constraints and development brief. This part of the peninsula is impacted by Sub Area 1.1 (Swanscombe Peninsula East Undeveloped*

		Area) for which the Local Plan Core Strategy recognises the development potential at Swanscombe Peninsula, but also the significant constraints suggesting that any development is only likely to be deliverable in the longer term.' Development management policies are also referenced. The Framework states *'Both Dartford and Gravesham Borough Councils are in the process of preparing new 'development management' policy which will have implications for Swanscombe Peninsula (e.g. Dartford's draft DPPD identifies a number of 'Identified employment areas' on the peninsula). Until then, current development management is determined by saved policies for both Boroughs, including: Dartford's 1995 Local Plan Saved Policies; and Gravesham's 1994 Local Plan First Review.'*
	Page 126	This page provides an overview of the existing development proposals at Swanscombe Peninsula and sets out an overview regarding the 'London Entertainment Resort'. The Framework states *'London [Resort] is conceived as a nationally significant visitor attraction and leisure resort to be located on approximately 545 hectares of predominantly brownfield land. The project would serve diverse and growing markets for leisure and holidays, conferences, entertainments and the creative arts, and could be a major focus for investment and regeneration in the area. Immediate accessibility to national and international rail services at Ebbsfleet International Station and to water-borne transport via the River Thames to central London could enable the resort to serve customers from throughout the UK, Europe and the rest of the world. An upgraded junction to the A2(T) could provide direct access by road with immediate connection to the M25 and M20 motorways.*

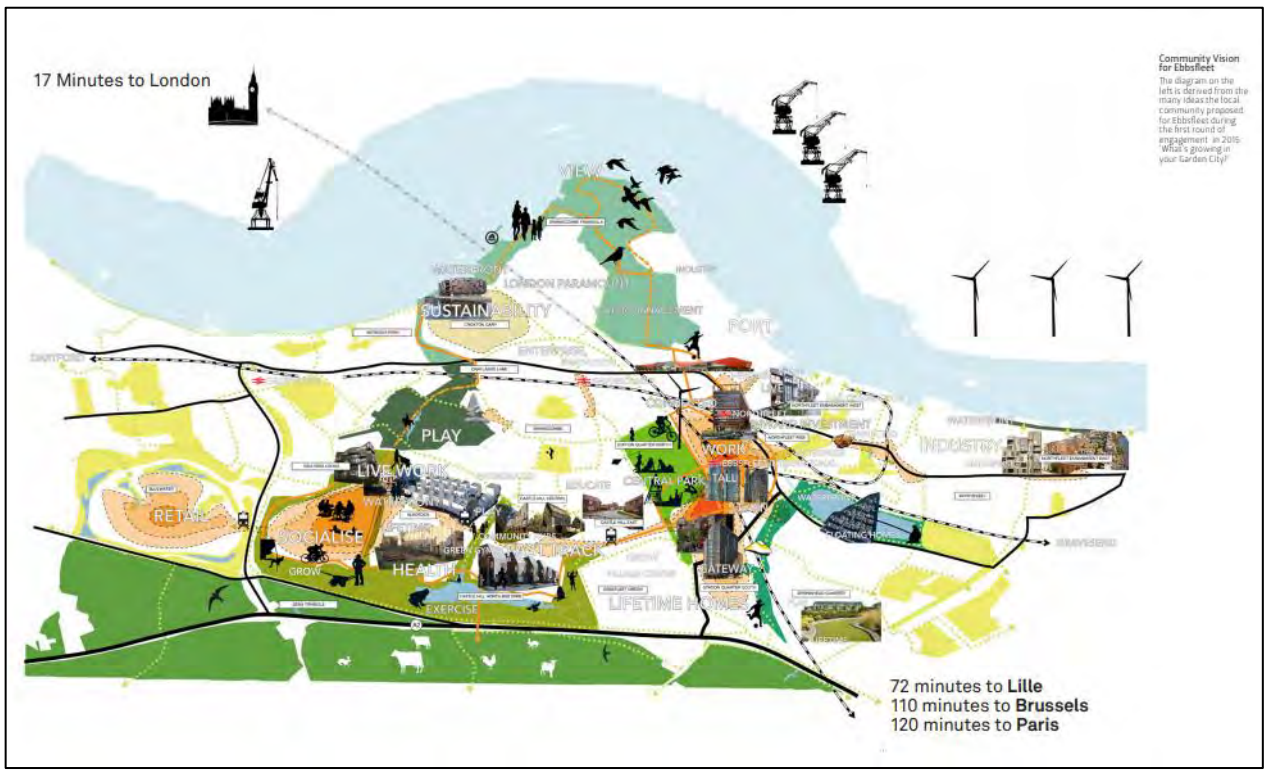
		The Resort would include a theme park, events spaces for conferences and exhibitions, service buildings and staff training facilities. There would also be up to 5,000 hotel rooms to meet visitors' accommodation needs. The Resort could directly employ around 13,000 people (and a further 14,000 indirectly) and visitor numbers are anticipated to be in the region of 15 million people per year. A substantial area is required for back of house facilities: staff car parking; utilities – waste water treatment (including upgraded CKD runoff leachate system), electricity substation, CHP, waste management; maintenance; storage and distribution centre for the resort & hotels. Other potential elements of the Resort include an energy centre to provide heat and power, as well as the creation of enhanced habitats.' The Framework notes the opportunities and constraints of Swanscombe Peninsula. The main point of relevance for the London Resort in the Framework states *'– Majority of site within EDC boundary is included within London Resort development NSIP pre-submission proposal.'*

Figure A4-9 Error! No text of specified style in document.**: Ebbsfleet Garden City Implementation Framework (2017): Ebbsfleet's Development Timeline**



Source: Ebbsfleet Development Corporation

Figure A4-10: Ebbsfleet Garden City Implementation Framework (2017): Community Vision for Ebssfleet



Source: Ebbsfleet Development Corporation

Figure A4-11: Ebbsfleet Garden City Implementation Framework (2017): Ebbsfleet's Vision for the Implementation Framework

Source: Ebbsfleet Development Corporation

Figure A4-12: Ebbsfleet Garden City Implementation Framework (2017): The Vision for Ebbsfleet Central

Source: Ebbsfleet Development Corporation

Figure A4-13: Ebbsfleet Garden City Implementation Framework (2017): Swanscombe Peninsula Opportunities and Constraints

Existing Uses
There are a number of commercial and industrial uses located across the Peninsula, and the relationship between new and existing activities will need to be managed.
Habitat and Ecology
Swanscombe Peninsula has a large areas of open space with significant habitat and ecological status.
Power Lines
Very large pylons dominate the landscape, although their location makes the physical impact on developable areas less significant
Flood Risk
The low lying nature of the Peninsula makes it prone to flood risk, which affects large areas currently identified for development - any interventions to manage flood risk on site will need to be carefully considered.
London
The infrastructure requirements of , especially transport, have the capacity to affect development (existing and new) adjacent to Swanscombe Peninsula.
Local plan allocated residential sites
Dartford's Core Strategy includes residential allocations for the Croxton Gary and 'Tank' site on London Road.
Transport Infrastructure
HS1 goes underground on the Swanscombe Peninsula, and its supporting infrastructure, including tunnels, needs to be accommodated into any development proposals with great care.
Existing Uses
The existing London Road sits on a narrow chalk spine, causing issues with regards to resilience of this key road within the local road network, and its ability to expand or sustain traffic loads.
Housing allocation
The Tank site has allocation in Dartford's Core Strategy for 200 homes
Connectivity to Ebbsfleet Central
The chalk spines carrying London Road and the North Kent Line sever the peninsula from the central area.
Swanscombe Peninsula
Opportunities and Constraints
Key
Ebbsfleet Development Corporation Area
Woodland
Flood zone 3
Public right of way
Overhead power line
Power line easement
Flood defence
Archaeological potential
Topography (5m)
Road network
Railway
River
Inland water
Priority Coastal saltmarsh (UK Biodiversity Action Plan)
Priority coastal floodplain grazing marsh (UK Biodiversity Action Plan)
Priority Mudflat (UK Biodiversity Action Plan)

Source: Ebbsfleet Development Corporation

Figure A4-14: Ebbsfleet Garden City Implementation Framework (2017): The Vision for Swanscombe Peninsula

Source: Ebbsfleet Development Corporation

Figure A4-15: Ebbsfleet Garden City Implementation Framework (2017) : The Vision for Ebbsfleet Central

Access and movement
The road and public transport network, and pedestrian/cycle connections, are shown in the diagram. The main components of this network include:
– Creation of an 'Ebbsfleet Hub' interchange between the two stations and with Fastrack routes through imaginative building design and facilitating/encouraging the use of the enhanced rail and the public transport network in the area.
– Completion of strategic road schemes, specifically the improvement of the A2 Ebbsfleet junction accommodating this level of development.
– Development of a series of local road improvements to accommodate development including Southfleet Road and Thames Way. Proposals should retain and enhance the road links through the centre along the A2260 and A226 to serve the wider area.
– Measures to accommodate Fastrack routes including Springhead Bridge and access to the station.
– Facilitation of dedicated Fastrack routes, along the main transit spine between Bluewater, Ebbsfleet Hub interchange, Northfleet Embankment and Gravesend.
– Provision of up to 9,000 car parking spaces associated with the International Station in order to create new development parcels in this area. Where possible these spaces should be dual use to support the wider commercial centre. It is envisaged that these spaces will be accommodated as an integral part of the built form within multi storey, under-croft or under-ground structures at appropriate locations within the Ebbsfleet Central area. This will be subject to further feasibility and architectural design.
– Consent for further 12,000 spaces as part of the Ebbsfleet scheme, and the reality that these themselves will be split between designated and non-designated spaces.
– Significant new and upgraded pedestrian and cycling connections directly to the transport hub formed by Ebbsfleet and Northfleet station. Particular focus on improved connections from Swanscombe, Northfleet, Springhead (via new bridge), Ebbsfleet Green and Eastern Quarry sites and within these sites.
– Additional pedestrian and cycle connection over London Road and rail lines to unlock access to Swanscombe Peninsula should be provided at the northern edge of the site.
– Potential 'vertical' connections provided for cyclists and pedestrians where the topography of the quarry limits movement and accessibility for these modes.
Issues for further consideration
London Access Route
London currently proposes a dedicated access route through this area which will comprise up to 4 lanes of dedicated highway. This highway would run alongside the HS1 rail line, and would require decking to facilitate implementation of the existing consented scheme, provide a comprehensive development platform and ensure the level and quality of connectivity commensurate with this central location.
Significant upgrade of existing cycle and pedestrian routes / bridges from Swanscombe
Fully connected pedestrian and cycle network
Major transport interchange - Ebbsfleet International and Northfleet Stations, and Fastrack
New cycle and pedestrian connection between Eastern Quarry and Ebbsfleet International Station
Plaza Bridge
New cycle and pedestrian connection between Eastern Quarry and Ebbsfleet International Station
Access Eastern Route
Potential multi-storey car park
Ebbsfleet Junction improvement (potential further land take required)
Dedicated Fastrack routes
The Vision for Ebbsfleet Central
Movement Network
Key
Railway corridor
Railway station
Existing fastrack transit spine
Proposed fastrack transit spine
Fastrack stop
Existing local bus route
London Resort road route alignment
London Resort underground road route alignment for further investigation
Road network
Key pedestrian and cycle way (on Site)
Key pedestrian and cycle way (off Site)

Source: Ebbsfleet Development Corporation

Existing local planning policy

Table A4-11: Summary of Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020)

Document	Policy/page/paragraph	Summary
Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020)	Policy CSM 1: Sustainable Development	This policy outlines a presumption in favour of sustainable development and approval of mineral development proposals in accordance with the NPPF and NPPG unless material considerations indicate otherwise.
	Policy CSM 2: Supply of Land-won Minerals in Kent	This policy supports the grant of planning permission for mineral working at sites identified in the minerals sites plan, subject to requirements in the site schedule of the development plan.
	Policy CSM 5: Land-won Mineral Safeguarding	This policy seeks to safeguard economic mineral resources from unnecessarily sterilised development by identifying Mineral Safeguard Areas, Mineral Consultation Areas, and Sites identified in the Mineral Sites Plan.
	Policy CSM 6: Safeguarded Wharves and Rail Depots (see Figure A4-16 below)	This policy seeks to protect the operation of existing, planned or potential sites such that their capacity or viability for minerals transportation is not compromises and as such, safeguards the following sites of relevance to the Resort in the Minerals Sites Plan: 7. Robin's Wharf, Northfleet (both operational sites) 15. Northfleet Wharf The policy also requires the Mineral Planning Authorities be consulted by LPAs on all development proposed at, or within 250m of, safeguarded minerals transportation facilities.
	Policy CSM 7: Safeguarding Other	Policy CSM7 seeks to safeguard the ongoing use of facilities associated with mineral plant infrastructure and requires that the LPA

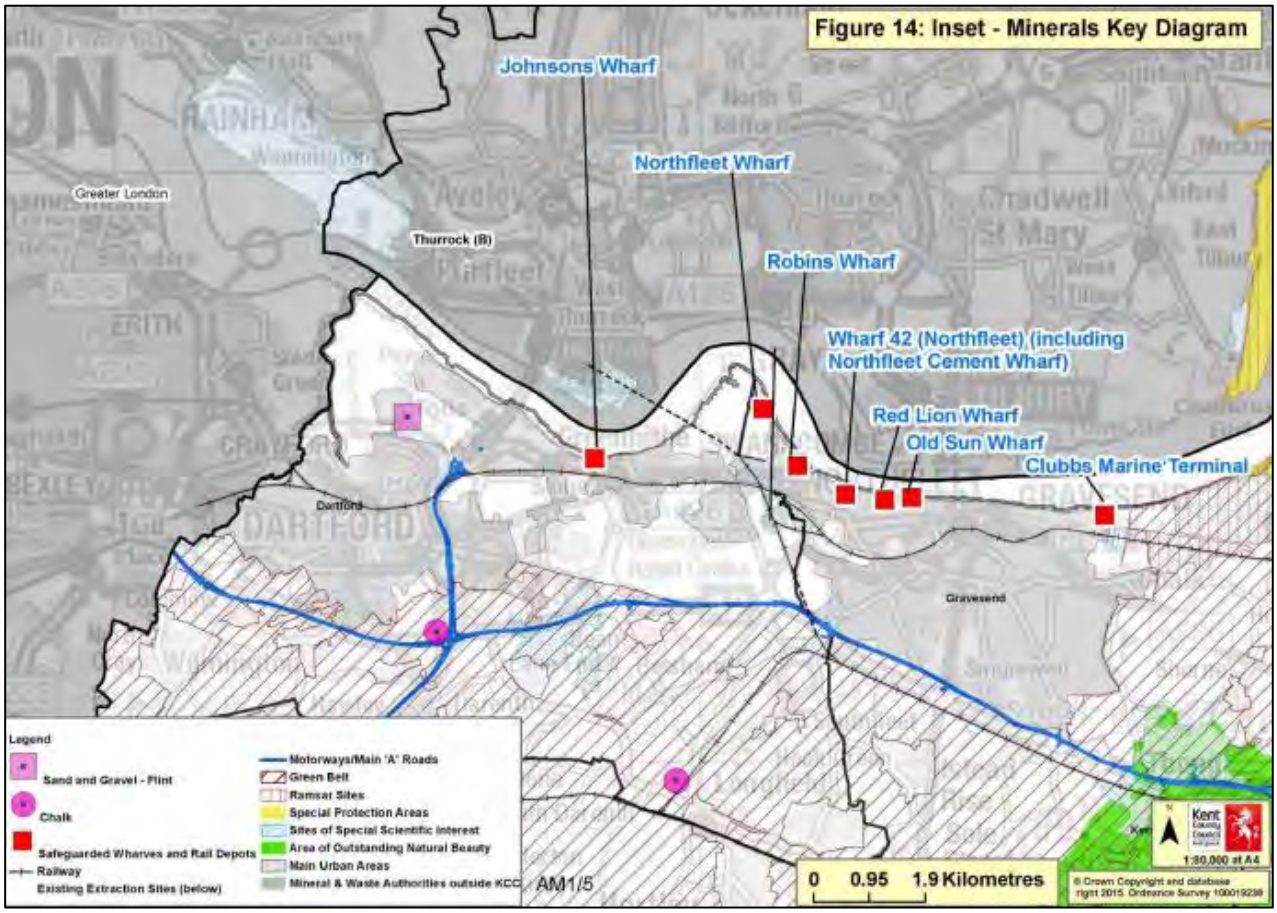
	Mineral Plant Infrastructure	consults with the Minerals Planning Authority for development proposals which are within 250m of safeguarded mineral plant infrastructure.
	Policy CSM 8: Secondary and Recycled Aggregates	This policy sets out the strategy to ensure a processing capacity of at least 2.7m tonnes of secondary and recycled aggregates is maintained through the Minerals Sites Plan and period of the Plan.
	Policy CSM 12: Sustainable Transport of Minerals	This policy sets out the criteria for development of new wharf and rail depot importation operations or for wharves and rail depots that have previously been operational that includes the transport of minerals by sustainable means.
	Policy CSW 1: Sustainable Development	This policy sets out the Council's approach to waste development proposals with a presumption in favour of sustainable development in accordance with the NPPF and NPPG.
	Policy CSW 2: Waste Hierarchy	This policy requires development proposals for waste management to demonstrate, where possible, compliance with the 'waste hierarchy'.
	Policy CSW 3: Waste Reduction	This policy seeks to ensure all new development minimises the production of construction, demolition and excavation waste and management of any waste in accordance with the objectives of Policy CSW2: Waste Hierarchy, setting out criteria for proposals to address.
	Policy CSW 4: Strategy for Waste Management Capacity	This policy sets out the Strategy for Waste Management Capacity in Kent.
	Policy CSW 6: Location of Built Waste Management Facilities	Policy CSW6 sets out the requirements expected of development proposals for uses on sites allocated in the Waste Sites Plan.

	Policy CSW 7: Waste Management for Non-hazardous Waste	This policy sets out the capacity for non-hazardous waste management facilities in Kent.
	Policy CSW 10: Development at Closed Landfill Sites	This policy supports development proposals at closed landfill sites for identified purposes.
	Policy CSW 13: Remediation of Brownfield Land	This policy supports the grant of temporary planning permission for waste development on brownfield land that facilities its redevelopment by reducing contamination.
	Policy CSW 15: Wastewater Development	This policy identifies that wastewater treatment works and sewage sludge treatment and disposal facilities will be granted permission subject to there being a proven need for the proposed facility.
	Policy CSW 16: Safeguarding of Existing Waste Management Facilities	This policy safeguards sites that have permission for waste management and requires that the LPA consults with the Waste Planning Authority for development proposals which are within 250m of safeguarded waste management facilities.
	Policy DM1: Sustainable Design	This policy sets out the design requirements for minerals and waste development proposals.
	Policy DM2: Environmental and Landscape Sites of International, National and Local Importance	This is a policy that requires proposals for minerals and/or waste do not adversely impact international, national, and local sites of importance.
	Policy DM3: Ecological Impact Assessment	Policy DM3 requires proposals that are likely to cause an unacceptable adverse impact on important biodiversity assets to demonstrate undertaking of an adequate ecological assessment.
	Policy DM4: Green Belt	Requires proposals for minerals and waste within the green belt to comply with national policy.
	Policy DM5: Heritage Assets	Policy DM5 seeks to protect heritage assets through ensuring development proposals

		conserve such assets in a manner appropriate to their significance.
	Policy DM6: Historic Environment Assessment	This policy identifies the requirements for development proposals which are likely to affect heritage assets, including assessments and mitigation.
	Policy DM7: Safeguarding Mineral Resources	This policy seeks to safeguard minerals from non-mineral development by requiring non mineral development proposals to demonstrate adherence to criteria.
	Policy DM8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities	This policy sets out the exception criteria for granting planning permission to development that is incompatible with safeguarded minerals management, transportation or waste management facilities.
	Policy DM9: Prior Extraction of Minerals in Advance of Surface Development	This policy makes provision for the prior extraction of minerals in advance of development proposals where the mineral would otherwise be sterilised, considering the timescales and impacts arising from the proposal.
	Policy DM10: Water Environment	Policy DM10 supports minerals and waste development providing defined impacts on the water environment do not arise as a result of the development.
	Policy DM11: Health and Amenity	This policy defines the requirements for minerals and waste developments, taking into account health and amenity impacts.
	Policy DM12: Cumulative Impact	Policy DM12 seeks to protect the environment and communities through consideration of cumulative impacts arising from development proposals.
	Policy DM13: Transportation of Minerals and Waste	This policy sets out the requirements to meet for minerals and waste developments which involve transportation, prioritising non-road modes of transport.
	Policy DM14: Public Rights of Way	This policy sets out requirements to meet for minerals and waste developments resulting in adverse effects on PRoW.

	Policy DM15: Safeguarding of Transportation Infrastructure	This policy supports minerals and waste proposals providing impacts on types of transport infrastructure are mitigated.
	Policy DM16: Information Required in Support of an Application	This policy defines the information required to support an application for minerals and waste development.
	Policy DM17: Planning Obligations	Policy DM17 seeks to secure sufficient control and mitigation for effects of minerals and waste development through planning obligations, where planning conditions cannot be achieved in an effort to achieve suitable control, mitigation and/or compensation.
	Policy DM18: Land Stability	This policy requires development proposals for mineral and waste to provide a stability report demonstrating that the development will not result in land instability.
	Policy DM19: Restoration, Aftercare and After-use	This policy seeks to ensure satisfactory provision of restoration, aftercare and after-use of mineral and waste developments.
	Policy DM20 Ancillary Development	This policy supports development proposals for ancillary development within or in close proximity to minerals and waste development subject to two criteria are met.
	Policy DM21: Incidental Mineral Extraction	This policy seeks to ensure mineral and waste sites can be restored to an alternative after-use in accordance with Policy DM19.

Figure A4-16: Kent Minerals and Waste Local Plan (September 2020): Inset – Minerals Key Diagram



Source: Kent County Council

Other policy documents

Table A4-12: Summary of other Kent policy documents

Document	Summary
Drainage and Planning Policy - a Local Flood Risk Management Strategy Document (December 2019)	This policy sets out how Kent County Council, as Lead Local Flood Authority and statutory consultee, will review drainage strategies and surface water management provisions associated with applications for major development. The strategy notes that it is consistent with the Non-Statutory Technical Standards for Sustainable Drainage. The strategy should be read in conjunction with the NPPF and Local Policy. The aim of this policy document is to clarify and reinforce the requirements of the national and local policy.
The Kent Design Guide 2014	This document is a Supplementary Planning Document adopted by Kent County Council and prepared by the Kent Design Initiative to provide guidance on good design in Kent. The SPD provides a starting point for good design which aims to inform development proposals on how to achieve high standards of design and construction by promoting a common approach to main principles that underline the LPAs criteria for assessing planning applications. The SPD seeks to ensure a consistent approach to design considerations across Kent.
Kent Environment Strategy (March 2016)	This document is a refresh on a previous strategy and identifies the current challenges facing Kent providing an update on the priorities to delivering the strategy. The strategy seeks to provide support to decision makers in development of ongoing evidence-based local strategy, policy and plan development.
Kent Biodiversity Action Plan (1997)	The Kent Biodiversity Action Plan sets out a framework for the future of Kent's wildlife through identifying the objectives of the framework and how it is implemented. In terms of policy implications, the framework identifies that land owners and managers, local authorities and statutory bodies have a role in protecting biodiversity and should incorporate the framework into their working practices. The framework also identifies that Development Plans have a major role in protecting important habitats and species from unsuitable developments.
Safeguarding Supplementary Planning Document (April 2017)	This document provides guidance on how policies on mineral and waste infrastructure safeguarding as set out in the Kent Minerals and Waste Local Plan will be implemented. The document provides guidance to local authorities and developers to inform development proposals including non-mineral or waste management development.

THURROCK COUNCIL

Existing

Table A4-13: Summary of Core Strategy and Policies for Management of Development (January 2015)

Document	Policy/page/paragraph	Summary
Core Strategy and Policies for Management of Development (January 2015)	Policy CSSP1: Sustainable Housing and Locations	This policy makes provision for the delivery of Thurrock's minimum requirements of 18,500 dwellings over the plan period through allocations in accordance with Policy PPS3. The Policy sets out the hierarchy of preference for new residential development and further identifies the allocations and phasing proportions of such development on PDL and within the Green Belt. Part 3 of the policy sets out the spatial distribution of proposed housing between 2009-2021 while part 4 refers to indicative locations and capacity for the period 2021-2026. The policy notes that Broad Locations are identified on the Key Diagram and Proposals Map.
	Policy CSSP2: Sustainable Employment Growth	This policy promotes and supports economic development in the Key Strategic Economic Hubs. Tilbury is identified as a hub based on its key sectors of port, logistics, transport and construction. It identifies business services, environmental technologies, recycling and energy as 'Growth Sectors'.
	Policy CSSP3: Sustainable Infrastructure	This policy sets out the Key Strategic Infrastructure Projects considered essential to the delivery of the Core Strategy.
	Policy CSSP4: Sustainable Green Belt	This policy sets out how the Council intends to maintain the Thurrock Green Belt.
	Policy CSSP5: Sustainable Greengrid	This policy defines how the Council and its Partners seek to deliver its objectives for the Greengrid Strategy and network to which development proposals must take into account, together with other considerations.
	Policy CSTP6: Strategic Employment Provision	This policy sets out the Thematic Policies that address local business expansion and relocation, the future use or redundant and under-used employment sites and economic

		development in the Regeneration Areas and Economic Hubs.
	Policy CSTP7: Network of Centres	This policy defines the network of centres for the area and sets out the Council's expectations to which development proposals are expected to deliver.
	CSTP8: Viability and Vitality of Existing Centres	This policy sets out how the Council intends to maintain and promote the retail function of existing centres through improving the vitality and viability for retail, leisure, cultural, business and residential uses. The policy also defines the meaning of 'town centres', 'main town centre uses', 'edge of town centre', and 'out of centre'.
	Policy CSTP9: Well-being: Leisure and Sports	This policy supports the delivery of high quality sports and leisure facilities through new and existing facilities, key sites, and developer contributions.
	Policy CSTP10: Community Facilities	This Policy identifies the Council's expectations for development proposals relating to existing facilities, new or improved facilities, key projects, as well as requirements for funding and developer contributions where development proposals may generate or exacerbate identified deficiencies.
	Policy CSTP11: Health Provision	This policy seeks to improve the health care infrastructure provision in Thurrock through setting out a tiered approach to the various health care provisions. The policy sets out how the Council will achieve this through working with other parties and also makes provision for private sector and developer contributions for new developments which will have an adverse impact on current accessibility an capacity of health care services.
	Policy CSTP12: Education and Learning	This policy sets out the objectives for education provision and requires new development proposals to contribute towards education in accordance with Policy CSSP3, Policy PMD16 and the Developer

		Contributions Supplementary Planning Document.
	Policy CSTP13: Emergency Services and Utilities	This policy sets out how existing and future emergency service provision will be met requiring developer contributions toward new or improved utilities or services to serve the proposed developments in accordance with Policy CSSP3, Policy PMD16 and the Developer Contributions Supplementary Planning Document.
	Policy CSTP14: Transport in the Thurrock Urban Area: Purfleet to Tilbury	This policy sets out how the Council intends to deliver at least a 10% reduction in car traffic from forecast 2026 levels.
	Policy CSTP15: Transport in Greater Thurrock	This policy sets out how the Council intends to improve transport accessibility in greater Thurrock, with particular consideration toward passenger services, integration with inter-urban public transport routes, prioritise PRoW/Bridleway improvements, develop local walking and cycling routes, support sustainable and healthy travel patterns, focus on regeneration or growth arears, and through ensuring new development promotes high levels of accessibility by sustainable transport modes.
	Policy CSTP16: National and Regional Transport Networks	This policy identifies how the Council intend to deliver improvements to national and regional transport networks with a focus on public transport, to ensure growth does not result in routes being above capacity.
	Policy CSTP17: Strategic Freight Movement and Access to Ports	This policy seeks to deliver positive impacts on freight activity in Thurrock and beyond through supporting logistics and port sectors by facilitating: rail and water-borne freight; lorry parks; and working with Freight Quality Partnerships and other partners.
	Policy CSTP18: Green Infrastructure	This policy seeks to restore, protect, enhance and where appropriate create green assets through a net gain from new development, creation where deficits exist, and project specific programmes.

	Policy CSTP19: Biodiversity	This policy sets out how development proposals will be expected to include measures to contribute positively to biodiversity in the Borough.
	Policy CSTP20: Open Space	This policy seeks to provide and maintain a range of accessible open space (including natural and equipped play and space) and requires adequate provision through new development proposals through developer contributions for open space improvement.
	Policy CSTP21: Productive Land	This policy seeks to protect, conserve and enhance agricultural land, productive land and soil in the Borough through appropriate land management, supporting productivity, identifying complementary uses, and making provision for allotments and urban production of food.
	Policy CSTP22: Thurrock Design	This policy seeks to ensure all development proposals are of a high quality design, taking into account local context, constraints and other material considerations.
	Policy CSTP23: Thurrock Character and Distinctiveness	This policy seeks to protect, manage and enhance the character of Thurrock through ensuring development proposals improve the quality and sense of place.
	Policy CSTP24: Heritage Assets and the Historic Environment	This policy seeks to protect and enhance heritage assets through defining priorities for heritage regeneration and enhancement and requiring all new development to consider proposals are appropriate for assets and their setting.
	Policy CSTP25: Addressing Climate Change	This policy requires all new development proposals to include climate change adaption measures and technology from the outset including consideration to mitigation measures.
	Policy CSTP26: Renewable or Low-Carbon Energy Generation	This policy promotes opportunities to generate energy from non-fossil fuel and low-carbon sources, whereby applications causing

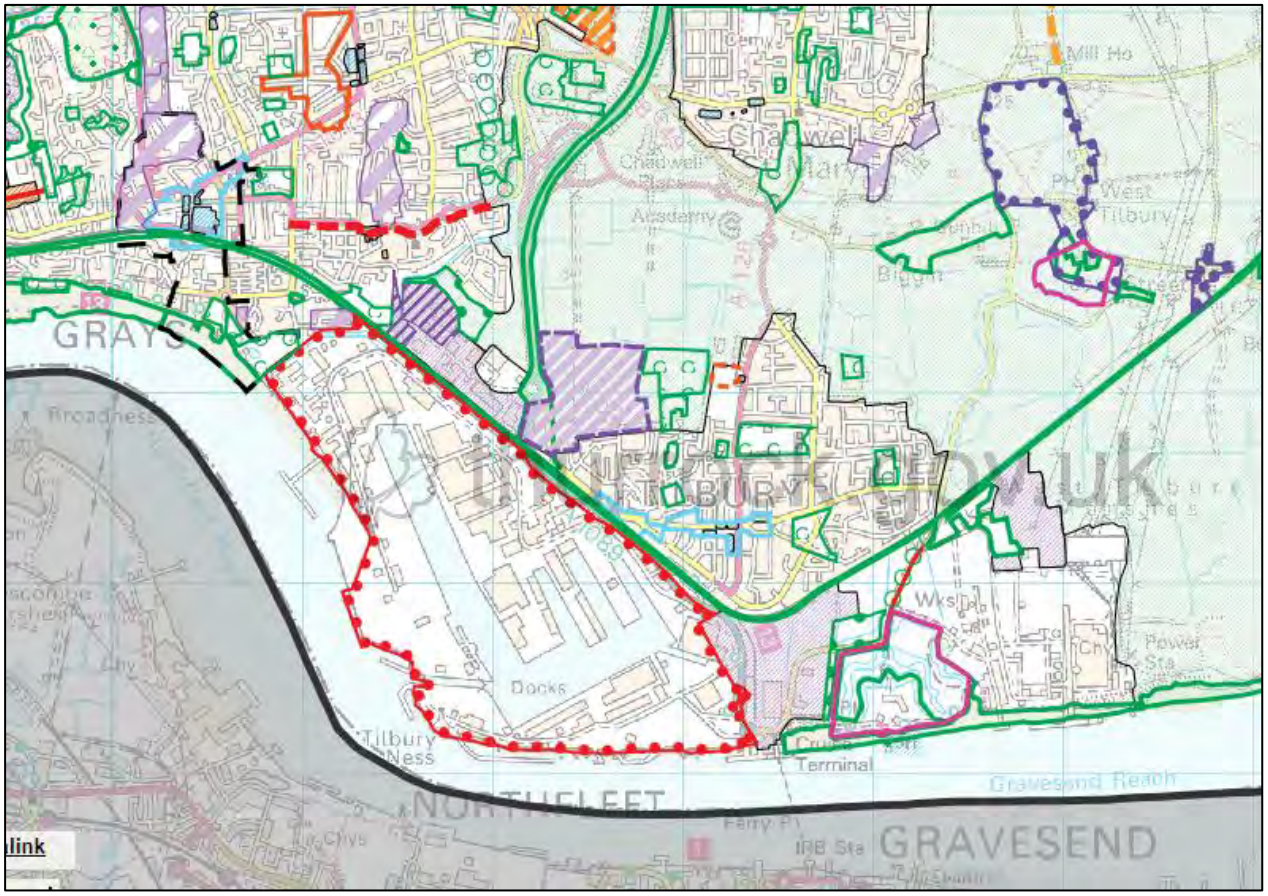
		an adverse impact will not be found acceptable.
	Policy CSTP27: Management and Reduction of Flood Risk	This policy sets out how the Council will ensure flood risk is managed through new development proposals in the context of national policy and guidance.
	Policy CSTP28: River Thames	This policy identifies how the Council and its Partners will ensure the economic and commercial function of the river Thames is promoted through new development proposals.
	Policy CSTP29: Waste Strategy	This policy sets out the Council's waste strategy which specifies requirements on new development proposals in the context of the waste hierarchy.
	Policy CSTP30: Regional Waste Apportionment	This policy sets out the provision to be made by Thurrock in terms of London's waste imports and resists new landfill sites to accommodate London's waste arising where capacity has been exceeded. The policy states that permission for new non-landfill waste facilities will only be granted where there is a clear benefit from the facility assessed against policy CSTP29 of the MWDPD.
	Policy CSTP32: Safeguarding Mineral Resources	This policy sets out how the Council intends to safeguard mineral resources with site specific allocations identified as being allocated in the forthcoming Thurrock Local Plan.
	Policy CSTP33: Strategic Infrastructure Provision	This policy is split into two sections, the first covers the adoption of a Strategic Infrastructure Delivery Plan by the Council and its Partners which will be the basis for the Core Strategy Infrastructure Trajectory. The second aspect covers the setup of a Strategic Infrastructure Board by the Council and its Partners in an aim to arrive at jointly agreed decisions on priorities for investment for infrastructure. The policy also notes the introduction of a Developer Contributions

		SPD and CIL Charing Schedule to support this policy.
	Policy PMD1: Minimising Pollution and Impacts on Amenity	This policy seeks to reduce impacts from development proposals on amenity with specific focus on the location of sensitive land uses through requiring assessments to demonstrate potential harm, and where necessary seek mitigation through planning condition or obligations. The policy covers matters such as air pollution, noise/vibration, contaminated ground, odour, light pollution and water pollution. It also relates to loss of privacy, visual intrusion and loss of light.
	Policy PMD2: Design and Layout	This policy is a criteria based policy which seeks to deliver good design by requiring all design proposals to consider the sensitivity of sites and their surrounding context through satisfying specific criteria.
	Policy PMD3: Tall Buildings	This policy sets out the Council's definition of tall buildings and the assessment criteria for development proposals to which tall buildings are proposed, considering site context and constraints.
	Policy PMD4: Historic Environment	This policy seeks to protect and enhance the fabric and setting of heritage assets through requiring new development proposals to positively contribute to the special qualities of such assets and take reasonable steps for their protection.
	Policy PMD5: Open Spaces, Outdoor Sports and Recreational Facilities	This policy sets out the standards required for new developments which includes the provision of new open spaces, outdoor sports and recreational facilities, including development contributions where necessary.
	Policy PMD6: Development in the Green Belt	This policy sets out how the Council intents to maintain, protect and enhance the Thurrock Green Belt and requires development proposals to comply with national and local policy.

	Policy PMD7: Biodiversity, Geological Conservation and Development	This policy seeks to protect and enhance biodiversity habitat and geological sites setting out requirements for new development proposals to consider from design stage through to management of such sites.
	Policy PMD8: Parking Standards	This policy requires all new development proposals to comply with car parking standards as set out in the Layout and Standards SPD.
	Policy PMD9: Road Network Hierarchy	This criteria based policy to which developments involving new and existing accesses must demonstrate compliance.
	Policy PMD10: Transport Assessments and Travel Plans	This policy requires development proposals to be accompanied by Transports Assessments, Transport Statements, and Travel Plans in accordance with the Department for Transport guidance in Guidance on Transport Assessments (March 2007).
	Policy PMD11: Freight Movement	This policy applies to new development proposals involving freight movement. Developments with a need for freight movements where the equivalent of 200 daily HGV movements is exceeded require a Sustainable Distribution Plan. The policy sets out that significant movements will require a HGV Impact Assessment and planning obligations will be used for HGVs to use Corridors of Movement (Policy PMD9) and to fund road improvements to mitigate impacts. The policy also requires a Vehicle Booking System for development of B1, B2 and B8 uses in excess of 30,000sqm secured by planning obligation. The policy also seeks to ensure adequate on-site space for loading/unloading in accordance with the Layout and Standards SPD.
	Policy PMD12: Sustainable Buildings	This criteria based policy sets out the requirements for new development proposals in terms of the type of development proposed (i.e. residential and

		non-residential) and standards of standards for sustainability.
	Policy PMD13: Decentralised, Renewable and Low Carbon Energy Generation	This policy seeks to ensure new developments of 5 or more residential dwellings, 1,000sqm or more of non-residential floor space to secure predicted energy from decentralised and renewable or low-carbon sources, unless confirmed to be unfeasible.
	Policy PMD14: Carbon Neutral Development	This policy seeks to minimise carbon emissions of new developments through requiring developers to demonstrate all viable energy efficiency measures and renewable or low carbon technology opportunities are utilised in accordance with PMD12 and PMD13.
	Policy PMD15: Flood Risk Assessment	This policy applies to development proposals on sites not covered by the Thurrock Sequential Test requiring such proposals to prepare a site-specific Sequential Test demonstrating compliance with national policy and guidance. The policy also requires developments to incorporate SUDS and provision of developer contributions where necessary.
	Policy PMD16: Developer Contributions	This policy sets out the Council's approach to securing developer contributions as part of new development proposals, considering a range of topic specific areas.

Figure A4-17: Core Strategy Local Plan Policies Map (January 2015)



Not to scale
Source: Thurrock Council

Table A4-14: Summary of Thurrock Borough Local Plan (September 1997) Saved Policies

Document	Policy/page/paragraph	Summary
Thurrock Borough Local Plan (September 1997) Saved Policies	Policy BE3: Urban Open Spaces	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policy CSTP 20.
	Policy LN7: Thames Chase (The East London Community Forest)	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSTP18, CSTP23 and PMD4.
	Policy LN10 Protected Lanes	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSTP18, CSTP23, PMD1 and PMD4.
	Policy LN12: Development Proposals and Nature Conservation	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSTP 18, CSTP19 and (in part) PMD7.
	Policy LN15: Sites of Importance for Nature Conservation	As above
	Policy LN16: Areas of Local Nature Conservation Significance and Ecological Corridors	As above
	Policy LN16A: Thames Foreshore Ecological Corridor – Industrialised Areas	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSTP19 and PMD7.
	Policy E1: Development within Primary Industrial and Commercial Areas	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSSP 2 and CSTP 6.
	Policy E2: Land for New Industrial and Commercial Development in Primary Areas	As above
	Policy E3: Development within Secondary Industrial and Commercial Areas	As above
	Policy E4: Land for New Industrial and Commercial	As above

	Development in Secondary Areas	
	Policy SH1: Major Retail Developments	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSSP 2, CSTP 6, CSTP 7 and CSTP 8.
	Policy SH8: New Local Shopping Facilities	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSSP 2, CSTP 6, CSTP 7 and CSTP 8.
	Policy LR4: Provision of Additional Open Spaces	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSTP 20 and PMD 5.
	Policy LR5: Retention of Existing Open Spaces	As above
	Policy T2: New Road Building	Replaced by Core Strategy and Policies for Management of Development (January 2015) Policies CSTP 14-CSTP17 and PMD 9-PMD 11
	Policy T3: Road Improvements Schemes	As above
	Policy T6: Traffic Management	As above
	Policy T8: Existing and New Public Footpaths	As above
	Policy T11: Cycleways	As above

Emerging

Table A4-15: Summary of Thurrock Local Plan (Issues and Options) (December 2018)

Document	Summary
Thurrock Local Plan (Issues and Options) (December 2018)	The document sets out key issues and challenges facing Thurrock which has informed the Local Plan vision and draft strategic options. Policies dealing with the following principles which are common to each Preferred Option will be developed as part of the Local Plan Preferred Option: • Delivering the right infrastructure, in the right place and at the right time; • Positive Health and Well Being Impact; • Meeting Thurrock's Housing Needs; • Protecting and enhancing the character of existing communities; • Minimising Carbon Emissions; • Maintaining an effective Green Belt; • Protecting and Delivering Quality in the Built Environment; • Meeting Employment Needs; • Ensuring our Town Centres continue to thrive; • Respecting the River Thames; and • Managing Waste.

Other policy documents

Table A4-16: Summary of other Thurrock policy documents

Document	Summary
Design Strategy Supplementary Planning Document (March 2017)	This document sets out design principles to inform development proposals in Thurrock. The document provides more guidance to support policies in the Core Strategy to inform the determination of planning applications. The document includes details on how to assess site context and guidance for: • Urban centres transport hubs; • Residential neighbourhoods; • Commerce and industry; • Lakeside; and • Village and rural locations.
Tilbury Development Framework (October 2017)	This document sets out the vision and principles for Tilbury to create a better *'living and working environment'*. The framework is referred to as a *'masterplan of ideas'* which covers: • Getting the most out of Tilbury's location, assets and existing infrastructure; • Expected improvements to public areas; • New proposals and initiatives; and • The framework will inform local policies of the emerging Local Plan for Thurrock.

Appendix 5.0 – Local planning policy thematic matrix

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Table A5-1: Dartford local planning policy thematic matrix

Policy	Air quality	Amenity	Community facilities	Cultural heritage / archaeology	Design / masterplanning	Ecology / nature conservation	Greenhouse gas / climate change	Housing	Land use	Socioeconomics / employment / skills	Human health	Transport	Landscape / open space	Materials / waste	Noise / vibration	Soils / hydrogeology / ground conditions	Sustainable development	Town centres / retail / leisure	Water resources / flood risk	Site specific
Dartford Core Strategy (September 2011)																				
Policy CS 1: Spatial Pattern of Development									X								X			
Policy CS 2: Dartford Town Centre									X									X		X
Policy CS 4: Ebbsfleet to Stone Priority Area								X	X											X
Policy CS 5: Ebbsfleet Valley Strategic Site								X	X											X
Policy CS 6: Thames Waterfront								X	X											X

Policy CS 7: Employment Land and Jobs										X									
Policy CS 8: Economic Change										X									
Policy CS 9: Skills and Training										X									
Policy CS 10: Housing Provision								X									X			X
Policy CS 11: Housing Delivery								X		X		X							
Policy CS 12: Network of Shopping Centres																		X	
Policy CS 13: Green Belt													X						
Policy CS 14: Green Space													X						
Policy CS 15: Managing Transport Demand												X							
Policy CS 16: Transport Investment												X							
Policy CS 17: Design of Homes		X			X			X											
Policy CS 18: Housing Mix								X											
Policy CS 19: Affordable Housing		X						X				X							
Policy CS 21: Community Services		X	X					X			X	X		X					
Policy CS 22: Sports, Recreation and Culture Facilities			X	X						X									X
Policy CS 23: Minimising Carbon Emissions	X				X		X												X

Policy CS 24: Flood Risk					X													X	
Policy CS 25: Water Management								X										X	
Policy CS 26: Delivery and Implementation			X							X	X	X							X
Dartford Development Policies Plan (July 2017)																			
Policy DP1: Dartford's Presumption in Favour of Sustainable Development									X							X			
Policy DP2: Good Design in Dartford				X	X								X	X			X	X	
Policy DP3: Transport Impacts of Development												X							
Policy DP4: Transport Access and Design					X							X							
Policy DP5: Environmental and Amenity Protection	X	X				X	X								X				
Policy DP6: Sustainable Residential Locations			X					X				X				X			
Policy DP7: Borough Housing Stock and Residential Amenity		X						X				X	X		X				
Policy DP8: Residential Space and Design in New Development		X			X			X					X						
Policy DP9: Local Housing Needs					X			X											
Policy DP11: Sustainable Technology and Construction																X			

Policy DP12: Historic Environment Strategy				X															
Policy DP13: Designated Heritage Assets				X															
Policy DP14: Retail and Town Centre Development																	X		
Policy DP15: Dartford Town Centre and its Primary Frontage																	X		X
Policy DP16: Dartford Town Centre's Secondary Areas																	X		X
Policy DP17: District Centres																	X		
Policy DP18: Neighbourhood Centres																	X		
Policy DP19: Food and Drink Establishments																	X		
Policy DP20: Identified Employment Areas										X									X
Policy DP21: Securing Community Facilities			X																
Policy DP22: Green Belt in the Borough									X										
Policy DP23: Protected Local Green Space									X				X						
Policy DP24: Open Space									X				X						
Policy DP25: Nature Conservation and Enhancement						X													

Table A5-2: Gravesham local planning policy thematic matrix

Policy	Air quality	Amenity	Community facilities	Cultural heritage / archaeology	Design / masterplanning	Ecology / nature conservation	Greenhouse gas / climate change	Housing	Land use	Socioeconomics / employment / skills	Human health	Transport	Landscape / open space	Materials / waste	Noise / vibration	Soils / hydrogeology / ground conditions	Sustainable development	Town centres / retail / leisure	Water resources / flood risk	Site specific
Gravesham Local Plan Core Strategy (September 2014)																				
Policy CS01: Sustainable Development									X								X			
Policy CS02: Scale and Distribution of Development			X	X	X			X					X	X				X		X
Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area																				X

Policy CS06: Ebbsfleet (Gravesham) Opportunity Area																				X
Policy CS07: Economy, Employment and Skills										X										
Policy CS08: Retail, Leisure and the Hierarchy of Centres																		X		
Policy CS09: Culture and Tourism				X														X		
Policy CS10: Physical and Social Infrastructure									X	X										
Policy CS11: Transport												X								
Policy CS12: Green Infrastructure						X														
Policy CS13: Green Space, Sport and Recreation			X			X														
Policy CS14: Housing Type and Size								X												
Policy CS15: Housing Density								X												
Policy CS16: Affordable Housing								X												
Policy CS18: Climate Change							X													
Policy CS19: Development and Design Principles	X	X	X	X	X	X	X	X	X		X	X	X	X	X		X		X	
Policy CS20: Heritage and the Historic Environment				X								X						X		
Gravesham Local Plan First Review (Saved Policies) (November 1994)																				
Policy S3: Maintenance of Shopping Frontages									X									X		X
Policy S4: Non-shopping									X									X		X

Uses in the Shopping Areas																				
Policy S7: Hot Food Shops and Restaurants and other A3 uses	X	X							X		X	X						X		
Policy TC2: Listed Buildings				X	X				X					X						
Policy TC3: Development Affecting Conservation Areas				X	X															
Policy TC7: Other Archaeological Sites				X																
Policy TC8: Advertisement Control		X			X													X		
Policy TC9: Shopfronts		X			X									X				X		
Policy LT6: Additional Open Space in New Housing Development		X	X					X					X							
Policy T1: Impact of Development on Highway Network								X		X		X								X
Policy T2: Impact of Development on Highway Network								X		X		X								
Policy T3: Impact of Development on Highway Network										X		X								
Policy T4: Impact of Development on Highway Network												X								
Policy T5: Access to the Identified Highway Network					X							X								X
Policy T6: South Thames-side												X								X

Development Route (A226 Diversion)																			
Policy T9: Housing Estate Layouts					X			X				X							
Policy P3: Vehicle Parking Standards					X					X		X							
Part 2: Draft Development Management Policies Document (October 2020)																			
Proposed Policy RE 2: Complementary, Cultural and Tourism Uses in Gravesend Town Centre									X									X	X
Proposed Policy RE 4: Food and Drink Establishments		X			X						X	X		X	X			X	
Proposed Policy INF 1: Route Safeguarding												X							X
Proposed Policy INF 2: Transport Design Principles	X				X		X				X	X							
Proposed Policy INF3: Understanding and Mitigating Transport Impacts												X							
Proposed Policy INF 4: New Accesses and Junctions	X											X							
Proposed Policy GI 1: Open Space, Playing Pitches and Sports Facilities Retention			X			X			X				X					X	
Proposed Policy GI 2: Open Space, Playing Pitches and Sports Facilities Provision		X	X		X	X			X				X				X	X	
Proposed Policy GI 3: Local Green Spaces			X						X										X

Proposed Policy GI 4: Trees, Hedgerows and Woodland		X			X	X						X	X						
Policy GI 5: Landscape Character					X	X						X	X						
Policy GI 6: Biodiversity					X	X													
Policy FW 1: Managing Water Quality																X			X	
Policy FW 2: Managing water supply and in new development					X			X								X			X	
Policy FW3: Managing Flood Risk									X								X		X	
Policy FW 4: Managing Waste Water Drainage		X										X		X			X		X	
Policy FW5: Managing Surface Water Drainage							X									X	X		X	
Proposed Policy AM 1: Air Quality	X	X				X					X					X				
Proposed Policy AM 2: Contaminated Land									X							X				
Proposed Policy AM 3: Light Pollution		X		X	X	X					X	X								
Proposed Policy AM 4: Sunlight and Daylight within New Development					X			X			X									
Proposed Policy AM5: Noise and Vibration															X					
Proposed Policy DES 3: Tall and Bulky Buildings		X		X	X												X			

Proposed Policy DES 4: Designing for a High Quality and Accessible Riverside				X	X	X		X				X							X	X
Proposed Policy HER 3: Conservation Areas									X											
Proposed Policy HER 4: Archaeology				X					X											

Table A5-3: Kent local planning policy thematic matrix

Policy	Air quality	Amenity	Community facilities	Cultural heritage / archaeology	Design / masterplanning	Ecology / nature conservation	Greenhouse gas / climate change	Housing	Land use	Socioeconomics / employment / skills	Human health	Transport	Landscape / open space	Materials / waste	Noise / vibration	Soils / hydrogeology / ground conditions	Sustainable development	Town centres / retail / leisure	Water resources / flood risk	Site specific
Kent Minerals and Waste Local Plan (as amended by Early Partial Review) (September 2020)																				
Policy CSM 1: Sustainable Development																	X			
Policy CSM 2: Supply of Land-won Minerals in Kent														X						
Policy CSM 5: Land-won Mineral Safeguarding														X						
Policy CSM 6: Safeguarded Wharves and Rail Depots												X								X

Policy CSM 7: Safeguarding Other Mineral Plant Infrastructure																			X
Policy CSM 8: Secondary and Recycled Aggregates													X						
Policy CSM 12: Sustainable Transport of Minerals												X		X					
Policy CSW 1: Sustainable Development																X			
Policy CSW 2: Waste Hierarchy													X						
Policy CSW 3: Waste Reduction													X						
Policy CSW 4: Strategy for Waste Management Capacity													X						
Policy CSW 6: Location of Built Waste Management Facilities													X						
Policy CSW 7: Waste Management for Non-hazardous Waste													X						
Policy CSW 10: Development at Closed Landfill Sites													X						
Policy CSW 13: Remediation of Brownfield Land									X				X						
Policy CSW 15: Wastewater Development													X					X	

Policy CSW 16: Safeguarding of Existing Waste Management Facilities														X					
Policy DM1: Sustainable Design					X														
Policy DM2: Environmental and Landscape Sites of International, National and Local Importance													X						X
Policy DM3: Ecological Impact Assessment																			X
Policy DM4: Green Belt									X										
Policy DM5: Heritage Assets				X															
Policy DM6: Historic Environment Assessment				X															
Policy DM7: Safeguarding Mineral Resources														X					
Policy DM8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities												X		X		X			
Policy DM9: Prior Extraction of Minerals in Advance of Surface Development														X					
Policy DM10: Water Environment																		X	
Policy DM11: Health and Amenity		X									X								

Policy DM12: Cumulative Impact																			X
Policy DM13: Transportation of Minerals and Waste												X		X					
Policy DM14: Public Rights of Way												X							
Policy DM15: Safeguarding of Transportation Infrastructure												X							
Policy DM16: Information Required in Support of an Application																			X
Policy DM17: Planning Obligations																			X
Policy DM18: Land Stability									X										
Policy DM19: Restoration, Aftercare and After-use									X										
Policy DM20 Ancillary Development									X										
Policy DM21: Incidental Mineral Extraction														X					

Table A5-4: Thurrock local planning policy thematic matrix

Policy	Air quality	Amenity	Community facilities	Cultural heritage / archaeology	Design / masterplanning	Ecology / nature conservation	Greenhouse gas / climate change	Housing	Land use	Socioeconomics / employment / skills	Human health	Transport	Landscape / open space	Materials / waste	Noise / vibration	Soils / hydrogeology / ground conditions	Sustainable development	Town centres / retail / leisure	Water resources / flood risk	Site specific
Core Strategy and Policies for Management of Development (January 2015)																				
Policy CSSP1: Sustainable Housing and Locations			X		X		X	X	X	X		X					X	X	X	X
Policy CSSP2: Sustainable Employment Growth										X							X	X		X
Policy CSSP3: Sustainable Infrastructure			X							X		X					X			X
Policy CSSP4: Sustainable Green Belt					X	X		X	X	X		X	X			X	X	X	X	X
Policy CSSP5: Sustainable Greengrid		X	X	X	X	X	X		X	X		X	X	X		X	X		X	X

Policy CSTP6: Strategic Employment Provision										X									
Policy CSTP7: Network of Centres																			X
Policy CSTP8: Viability and Vitality of Existing Centres																	X		
Policy CSTP9: Well-being: Leisure and Sports																	X		
Policy CSTP10: Community Facilities			X							X							X		X
Policy CSTP11: Health Provision			X					X		X	X	X							X
Policy CSTP12: Education and Learning			X							X							X		X
Policy CSTP13: Emergency Services and Utilities			X								X	X		X		X		X	X
Policy CSTP14: Transport in the Thurrock Urban Area: Purfleet to Tilbury	X		X			X		X		X	X	X	X				X	X		X
Policy CSTP15: Transport in Greater Thurrock					X	X				X		X					X			X
Policy CSTP16: National and Regional Transport Networks										X		X					X			X
Policy CSTP17: Strategic Freight Movement and Access to Ports								X				X								X
Policy CSTP18: Green Infrastructure			X	X	X	X			X			X								
Policy CSTP19: Biodiversity			X			X	X					X				X				X
Policy CSTP20: Open Space		X	X	X	X	X			X		X	X	X				X			

Policy CSTP21: Productive Land		X		X		X	X		X	X		X				X	X		X	X
Policy CSTP22: Thurrock Design					X					X							X			
Policy CSTP23: Thurrock Character and Distinctiveness				X				X		X		X	X					X		X
Policy CSTP24: Heritage Assets and the Historic Environment				X									X							X
Policy CSTP25: Addressing Climate Change					X		X							X			X		X	
Policy CSTP26: Renewable or Low-Carbon Energy Generation							X						X				X			
Policy CSTP27: Management and Reduction of Flood Risk									X								X		X	
Policy CSTP28: River Thames				X		X			X			X	X				X		X	X
Policy CSTP29: Waste Strategy										X	X			X		X	X			X
Policy CSTP30: Regional Waste Apportionment														X						
Policy CSTP32: Safeguarding Mineral Resources														X						
Policy CSTP33: Strategic Infrastructure Provision																				X
Policy PMD1: Minimising Pollution and Impacts on Amenity	X	X				X		X	X	X	X				X	X			X	

Policy PMD2: Design and Layout		X	X	X	X	X			X		X	X	X				X	X	X	
Policy PMD3: Tall Buildings			X	X	X			X		X			X			X	X			
Policy PMD4: Historic Environment				X									X							
Policy PMD5: Open Spaces, Outdoor Sports and Recreational Facilities			X			X		X					X				X	X		
Policy PMD6: Development in the Green Belt	X	X				X		X	X	X		X	X		X			X		
Policy PMD7: Biodiversity, Geological Conservation and Development				X		X										X				
Policy PMD8: Parking Standards								X				X								
Policy PMD9: Road Network Hierarchy	X										X	X		X	X		X			
Policy PMD10: Transport Assessments and Travel Plans								X		X		X								
Policy PMD11: Freight Movement								X				X					X	X		
Policy PMD12: Sustainable Buildings					X	X		X						X			X		X	
Policy PMD13: Decentralised, Renewable and Low Carbon Energy Generation							X	X										X		X
Policy PMD14: Carbon Neutral Development							X										X			

Policy PMD15: Flood Risk Assessment					X												X		X	
Policy PMD16: Developer Contributions		X	X	X		X		X		X		X	X						X	X
Thurrock Borough Local Plan (September 1997) Saved Policies																				
Policy BE3: Urban Open Spaces													X							X
Policy LN7: Thames Chase (The East London Community Forest)																				X
Policy LN10 Protected Lanes																				X
Policy LN12: Development Proposals and Nature Conservation						X														
Policy LN15: Sites of Importance for Nature Conservation						X														
Policy LN16: Areas of Local Nature Conservation Significance and Ecological Corridors						X														
Policy LN16A: Thames Foreshore Ecological Corridor – Industrialised Areas																				X
Policy E1: Development within Primary Industrial and Commercial Areas										X										X
Policy E2: Land for New Industrial and Commercial									X	X										X

Development in Primary Areas																			
Policy E3: Development within Secondary Industrial and Commercial Areas										X									X
Policy E4: Land for New Industrial and Commercial Development in Secondary Areas									X	X									X
Policy SH1: Major Retail Developments																		X	X
Policy SH8: New Local Shopping Facilities																		X	X
Policy LR4: Provision of Additional Open Spaces													X						X
Policy LR5: Retention of Existing Open Spaces													X						X
Policy T2: New Road Building												X							X
Policy T3: Road Improvements Schemes												X							X
Policy T6: Traffic Management												X							X
Policy T8: Existing and New Public Footpaths												X							X
Policy T11: Cycleways												X							X

Appendix 6.0 – Retail and leisure map

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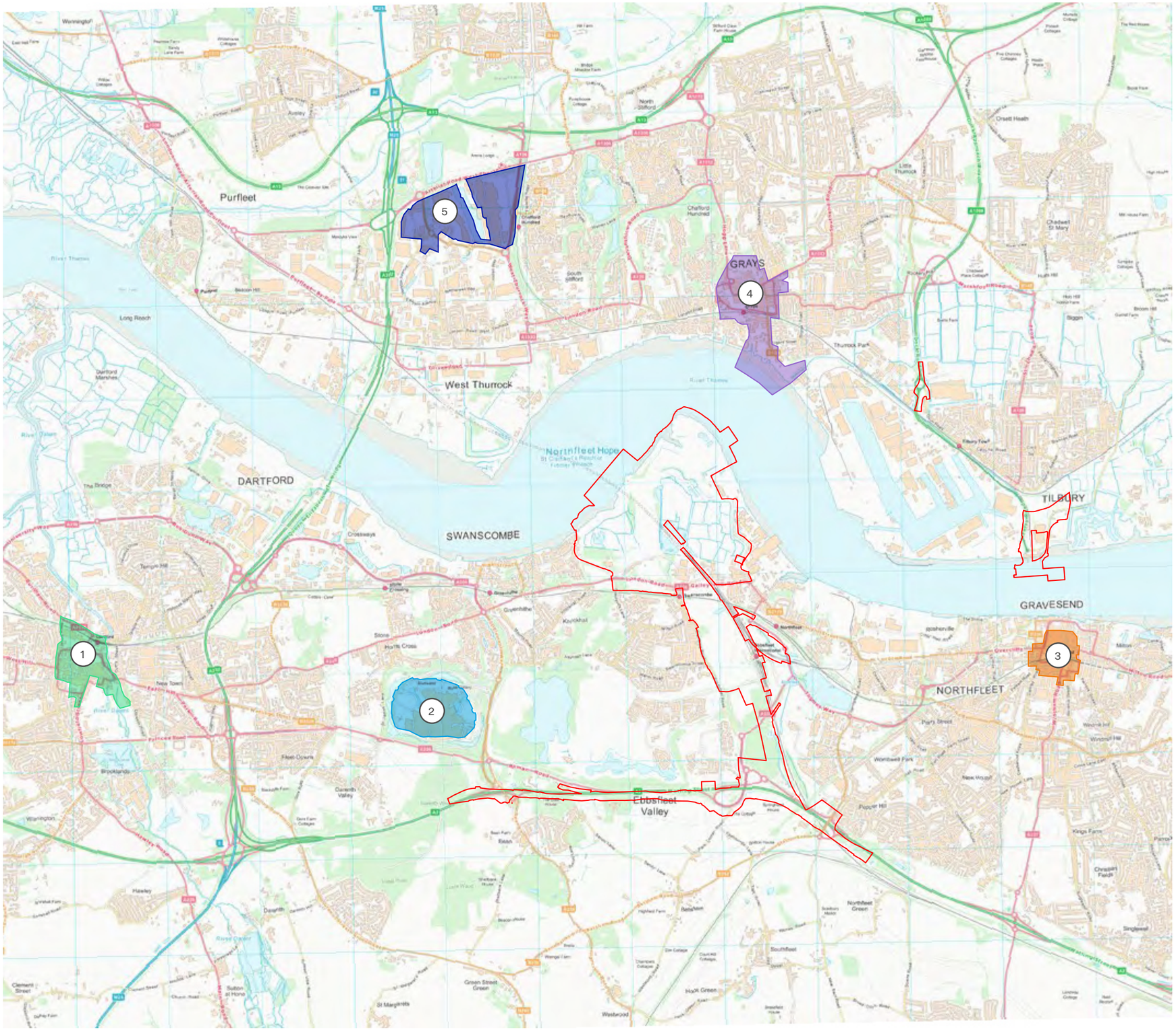
Retail and Leisure Map



Order Limit

1. Dartford Town Centre
2. Bluewater Shopping Centre
3. Gravesend Town Centre
4. Grays Town Centre
5. Lakeside Shopping Centre

Appendix 7.0 – Sequential test

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DARTFORD

Table A7-1: Sequential test of identified sites within the Dartford Borough

Site	Town centre, edge of centre or out of centre	Site area (approx.)	Policy allocation / promotion	Proposed uses	Key planning history	Available[1]	Suitable	Viable
Station Quarter / Mound	Town Centre	2.1 ha	Policy CS2: Dartford Town Centre of the Dartford Core Strategy (September 2011) Dartford Town Centre Framework SPD (July 2018)	New Dartford station building Improved interchange facilities Mixed uses, including cafes, pubs and restaurants, housing, employment, hotel, community facilities and supporting retail and leisure uses	None.	No	No	N/A

[1] Within a reasonable period. The PPG notes that when considering what a 'reasonable period' is, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.

Land east of Lowfield Street	Town Centre	2.6 ha	Policy CS2: Dartford Town Centre of the Dartford Core Strategy (September 2011) Dartford Town Centre Framework SPD (July 2018)	Residential-led mixed-use development with other main town centre uses to the northern end	Hybrid planning permission granted September 2017 across much of the site (DBC ref. 16/01919/FUL), with subsequent applications.	No	No	N/A
Hythe Street (former Co-op site)	Town Centre	1.3 ha	Policy CS2: Dartford Town Centre of the Dartford Core Strategy (September 2011) Dartford Town Centre Framework SPD (July 2018)	Mixed use development, including hotel, retail, leisure and community uses, food and drink uses and cinema	Full planning application submitted March 2020 (DBC ref. 20/00409/FUL).	No	No	N/A
Kent Road (former Westgate car park)	Town Centre							

Orchards Shopping Centre	Town Centre	1.7 ha	Policy CS2: Dartford Town Centre of the Dartford Core Strategy (September 2011) Dartford Town Centre Framework SPD (July 2018)	Improved modern retail/ leisure facilities	Various, none of particular relevance.	No	No	N/A
Priory Shopping Centre	Town Centre	1.6 ha	Policy CS2: Dartford Town Centre of the Dartford Core Strategy (September 2011) Dartford Town Centre Framework SPD (July 2018)	Improved modern retail/ leisure facilities	Various, none of particular relevance.	No	No	N/A

Ebbsfleet Valley Strategic Site	Out of centre	/	Policy CS5: Ebbsfleet Valley Strategic Site of the Dartford Core Strategy (September 2011)	Residential (10,000 homes), business district, leisure and retail uses to support local residents, workers and visitors, community facilities required to support the residential community	Various, see Chapter 8 of the *Planning Statement* (document reference 7.4).	No	No	N/A
Northern Gateway Strategic Site	Edge of centre / Out of centre	/	Policy CS3: Northern Gateway Strategic Site of the Dartford Core Strategy (September 2011) Northern Gateway SPD (April 2012)	Residential (up to 2,040 units), employment floorspace, public realm, open space, primary school and other community facilities		No	No	N/A
Riverside (Wickes) site	Town Centre	1.5 ha	Dartford Town Centre Framework	Residential	Various, none of particular relevance.	No	No	N/A

			SPD (July 2018)					
Home Gardens	Town Centre	1.2 ha	Dartford Town Centre Framework SPD (July 2018)	Enhanced public realm and intensified redevelopment of the surface car park	Various, none of particular relevance.	No	No	N/A
BT Exchange Site	Town Centre	0.3 ha	Dartford Town Centre Framework SPD (July 2018)	Residential, office and community uses	Various, none of particular relevance.	No	No	N/A
Prospect Place	Town Centre	4.3 ha	Dartford Town Centre Framework SPD (July 2018)	Retail, food and drink, residential	Various, none of particular relevance.	No	No	N/A
Land at Westgate Road/Kent Road/Orchard Street	Town Centre	0.3 ha	Dartford Town Centre Framework SPD (July 2018)	Intensified development in association with neighbouring development	Various, none of particular relevance.	No	No	N/A
Instone Road Gateway	Town Centre	1.8 ha	Dartford Town Centre Framework	Intensified mixed-use development	Various, none of particular relevance.	No	No	N/A

			SPD (July 2018)					
Market Street gateway	Town Centre	0.6 ha	Dartford Town Centre Framework SPD (July 2018)	Integrated redevelopment	Various, none of particular relevance.	No	No	N/A
Spital Street	Town Centre	0.1 ha	Dartford Town Centre Framework SPD (July 2018)	Integrated redevelopment	Various, including full planning permission granted in February 2013 for ground floor commercial use and upper floor hotel (DBC ref. 12/01297/FUL).	No	No	N/A
High Street Shopping Centres (Priory Shopping Centre and Orchard Shopping Centre)	Town Centre	/	Dartford Town Centre Framework SPD (July 2018)	Improved modern retail/ leisure facilities	Various, none of particular relevance.	No	No	N/A

GRAVESHAM

Table A7-2: Sequential test of identified sites within the Gravesham Borough

Site	Town centre, edge of centre or out of centre	Site area (approx.)	Policy	Proposed uses	Key planning history	Available[2]	Suitable	Viable
Land East of Grove Road and Robin's Creek (Key Site 1.3) (Northfleet Embankment & Swanscombe Peninsula East Opportunity Area)	Edge of centre	8.6 ha	Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area	Residential-led mixed use	Various, including request for Scoping Opinion for a residential-led mixed use development (EDC ref. EDC/20/0099).	Yes	No	N/A
Old Northfleet Residential Extension (Key Site 1.4)	Edge of centre	13.9 ha	Policy CS03: Northfleet Embankment and Swanscombe	Residential	Various, including outline planning permission granted in June 2018 for a mixed development	No	No	N/A

[2] Within a reasonable period. The PPG notes at paragraph 011 that when considering what a 'reasonable period' is, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account (Paragraph: 011 Reference ID: 2b-011-20190722).

(Northfleet Embankment & Swanscombe Peninsula East Opportunity Area)			Peninsula East Opportunity Area		and comprising up to 532 residential units, up to 46,000sqm employment floorspace, mixed use neighbourhood centre, community centre etc. (EDC ref. EDC/16/0004).			
Northfleet Cement Works Regeneration Area (Key Site 1.5) (Northfleet Embankment & Swanscombe Peninsula East Opportunity Area)	Edge of centre	33.5 ha	Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area	Employment		No	No	N/A
Northfleet Embankment East Regeneration Area (Key Site 1.8) (Northfleet Embankment & Swanscombe Peninsula East	Edge of centre	30.5 ha	Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area	Employment	Various, including hybrid planning permission granted in March 2019 for, amongst other matters, full planning permission for 598 residential units and outline planning	No	No	N/A

Opportunity Area)					permission for two form entry primary school (EDC ref. EDC/17/0038).			
Canal Basin Regeneration Area (Key Site 2.1) (Gravesend Riverside East & North East Gravesend Opportunity Area)	Edge of centre	7.5 ha	Policy CS04: Gravesend Riverside East and North	Mixed use development of around 650 residential units 4,650 sqm employment floorspace	Various, including request for EIA Scoping Opinion in respect of up to 1,500 residential units and 4,500 sqm commercial space (GBC ref. 20201229) and and earlier request with a lower number of residential units of up to 1,300 (GBC ref. 20200955).	No	No	N/A
North East Gravesend Regeneration Area (including Key Sites) (Gravesend Riverside East & North East Gravesend	Out of centre	13.5 ha	Policy CS04: Gravesend Riverside East and North	130 dwellings and around 17,570 sqm gross employment floorspace	Various, including outline planning permission granted in April 2016 for up to 130 residential units (GBC ref. 20110197), planning permission granted in July 2017 for industrial land and	No	No	N/A

Opportunity Area)					access road (GBC ref. 20160114), planning permission granted in September 2016 for the erection industrial units (GBC ref. 20160314) and outline planning permission granted in October 2016 for industrial development (GBC ref. 20160665).			
Heritage Quarter (Gravesend Town Centre Opportunity Area)	Town Centre	/	Policy CS05: Gravesend Town Centre Opportunity Area	Residential-led mixed use, including comparison retail and hotel	Various, none of particular relevance.	No	No	N/A
Northfleet Rise Quarter (Key Site 4.1) (Ebbsfleet (Gravesham) Opportunity Area)	Out of centre	22.1 ha	Policy CS06: Ebbsfleet (Gravesham) Opportunity Area	Employment-led mixed use	Various, see Chapter 8 of the *Planning Statement* (document reference 7.4).	No	No	N/A

Springhead Quarter (Key Site 4.2) (Ebbsfleet (Gravesham) Opportunity Area)	Out of centre	46.3 ha	Policy CS06: Ebbsfleet (Gravesham) Opportunity Area	Residential		No	No	N/A
Land at Coldharbour Road (Key Site)	Out of centre	23.6 ha	Policy CS21: Land at Coldharbour Road Key Site	Residential (north of Coldharbour Road) and employment (south of Coldharbour Road)	Various, including outline planning permission granted in January 2018 for up to 400 residential units (GBC ref. 20141214) and full planning permission granted in February 2020 for a foodstore and employment units (GBC ref. 20181271).	No	No	N/A